

Page 1

1 IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN  
2 DISTRICT OF FLORIDA  
3 CASE NO. 1:22-CV-24066-KMM

4 GRACE, INC., ET AL.,  
5 Plaintiffs,

6 -vs-

7 CITY OF MIAMI,

8 Defendant.

9 \_\_\_\_\_ /  
10  
11  
12 Gray Robinson PA  
13 333 SE 2nd Avenue  
14 Suite 3200  
15 Miami, Florida 33131  
16 Wednesday, October 11, 2023  
17 1:59 p.m. - 5:24 p.m.

18  
19 DEPOSITION OF REVEREND NATHANIEL ROBINSON, III  
20  
21  
22  
23

24 Taken before Robyn Maxwell, RPR, FPR,  
25 RSA, and Notary Public in and for the State of Florida at  
Large, pursuant to Notice of Taking Deposition filed in  
the above-mentioned cause.

Page 2

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1 Thereupon,

2 the following proceedings began at 1:59 p.m.:

3 THE COURT REPORTER: Raise your right hand,  
4 please.

5 Do you solemnly swear or affirm the  
6 testimony you are about to give in this matter  
7 will be the truth, the whole truth and nothing but  
8 the truth?

9 THE WITNESS: Yes, I do.

10 Thereupon,

11 REVEREND NATHANIEL ROBINSON, III,  
12 having been first duly sworn or affirmed, was examined  
13 and testified as follows:

14 DIRECT EXAMINATION

15 BY MR. LEVESQUE:

16 Q. Good afternoon, Reverend Robinson. My name  
17 is George Levesque. I represent the City of Miami in  
18 this litigation.

19 Before we get started, can you please state  
20 your full name for the record?

21 A. Sure. My name is Reverend Nathaniel  
22 Robinson, III.

23 Q. Where you were born?

24 A. Tallahassee, Florida.

25 Q. Okay. That's where I live now. I was

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1 going to say it's my hometown, but it's not my hometown.

2 A. Great city.

3 Q. So have you ever had your deposition taken  
4 before?

5 A. No, sir.

6 Q. Okay. What I'm going do is go over some of  
7 the rules of the road, as we're going over the  
8 conversation. Obviously, one of the aspects of the  
9 conversation is we've got a court reporter here that is  
10 taking down everything that we say. As we're talking,  
11 just like if we're in a restaurant and talk, we'd nod,  
12 we'd shake our heads, and we'd know exactly what each  
13 other means, but as she's taking everything down, head  
14 shakes and head nods are a little bit heard harder to  
15 transcribe. So at different times, you might shake your  
16 head in response to a question, and I might say is that a  
17 "yes," or is that a "no"? I'm not doing it to be rude  
18 I'm just trying to make sure that we get a good record.

19 A. I understand.

20 Q. So I might prompt you on that sometimes.  
21 Sometimes your counsel might because I'm not always the  
22 best at doing it.

23 One of the other aspects of this is that  
24 for the most part, I'll be asking questions, you'll be  
25 giving answers. If there's ever a question that you

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1 don't understand, please ask me to repeat it or ask me to  
2 rephrase it, and I'll do the best that I can.

3                   If you answer the question that I ask, I'm  
4 going to assume that we were on the same page and that  
5 you understood the question that I was asking; is that  
6 fair?

7                   A. Yes, sir.

8                   Q. One of the other aspects of a deposition is  
9 that at different times, your counsel may not like one of  
10 the questions that I ask. Sometimes the questions that I  
11 ask are poorly worded or confusing, and they may object.  
12 When they object, let them get their objection on the  
13 record, and then I might ask for clarification or I might  
14 ask you to answer.

15                  At other times they may object and instruct  
16 you not to answer. We'll have a colloquy on that when  
17 that comes up, but I do my best to try to avoid those  
18 questions.

19                  If -- if at any time you need a break,  
20 please let me know. This isn't intended to be torture  
21 even though you're having to talk to your lawyer today.  
22 So if you need to go to the restroom or anything like  
23 that, just ask and we can take a break. The only thing  
24 that I would ask is, if we have a question pending, go  
25 ahead and answer the question, and then we can go ahead

1 and take a break.

2                   The other thing and the last thing that  
3 I'll bring up is that, as we're having a conversation you  
4 might know exactly where I'm going with my question and  
5 want to answer it. Wait until I finish my question for  
6 lots of reasons: I might put a little twist on the end  
7 before I get there, and you don't want to answer the  
8 wrong question, but also, if we're talking over each  
9 other, it makes it harder for the court reporter to take  
10 things down.

11                  Are you currently on any medication that  
12 would affect your ability to testify today?

13                  A. No.

14                  Q. Okay. What is your current residential  
15 address?

16                  A. 1088 Northwest 208 Terrace, Miami Gardens,  
17 Florida 33169.

18                  Q. And is that within the city limits?

19                  A. In the City of Miami Gardens.

20                  Q. City of Miami?

21                  A. No.

22                  Q. And you're aware that you're here as the  
23 corporate representative for, what we'll call, GRACE?

24                  A. Yes.

25                  Q. Are you familiar with that organization

Page 8

1 that goes by that acronym?

2 A. Yes.

3 Q. And what does GRACE stand for?

4 A. Grove Rights and Community Equity.

5 Q. And what is GRACE?

6 A. GRACE is an organization made up of  
7 churches, civic groups, nonprofits, residents homeowners,  
8 small business owners in West Coconut Grove.

9 Q. Did you review any documents to get ready  
10 for your deposition today?

11 A. Yes.

12 Q. What documents did you review?

13 A. The bylaws for GRACE

14 Q. Did you review any other documents?

15 A. No.

16 Q. Other than your attorneys, did you speak to  
17 anyone to get ready for your deposition today?

18 A. No.

19 Q. And I am going to provide you a document  
20 that we're going to mark Defendant's Exhibit 1.

21 (Defense Exhibit 1 was marked.)

22 BY MR. LEVESQUE:

23 Q. Now, Reverand Robinson, if you wouldn't  
24 mind taking a look at that document.

25 Have you seen that document before?

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1 A. I don't remember seeing this document.

2 Q. Okay. If I can ask you to flip to Page 4.

3 A. Okay.

4 Q. Do you remember seeing that list before of  
5 topics?

6 A. Yes.

7 Q. And I believe they continue over on to  
8 Page 5.

9 A. Yes.

10 Q. So is it your understanding today that you  
11 are the designated representative for GRACE that will be  
12 addressing those topics?

13 A. Yes.

14 Q. Let's start with the first one.

15 What can you tell me about G.R.A.C.E.'s  
16 organizational structure?

17 A. Again, GRACE is made up of churches,  
18 nonprofits, civic groups, homeowners, tenants, small  
19 business owners in West Coconut Grove. GRACE has  
20 members, member organizations and a board of directors.  
21 The board of directors has a chair, a vice -- a vice  
22 chair, a treasurer and a secretary.

23 Q. And who are on the board of directors?

24 A. Currently myself, Reynold Martin, Carolyn  
25 Donaldson, Christopher Hudson, Apostle John Chambers,

Page 10

1 Bruno Phanord and Anthony Alfieri. Oh, I'm sorry.

2 Clarice Cooper, as well.

3 Q. And who is the current chair?

4 A. The current chair is Reynold Martin.

5 Q. And the vice chair?

6 A. Carolyn Donaldson.

7 Q. And the treasurer?

8 A. Clarice Cooper.

9 Q. And the secretary?

10 A. Christopher Hudson.

11 Q. And when was GRACE formed?

12 A. Jan- -- it -- GRACE became an official  
13 nonprofit in January of 2019.

14 Q. And you'd indicate that it became an  
15 official nonprofit in January of 2019.

16 Prior to January of 2019, was it a loosely  
17 associated group of individuals and businesses and  
18 nonprofits and churches?

19 A. Prior to GRACE being incorporated, it was  
20 known as the West Coconut Grove -- I'm sorry. It was --  
21 let me start over.

22 It was known as the West Coconut Grove  
23 Ministerial Alliance and the Homeowners and Tenants  
24 Association West Grove Task Force.

25 And -- and yes, to your question, small

Page 11

1 business owners, tenants, residents, homeowners,  
2 churches, civic groups. Those are all people who are  
3 called to the table for -- for the task force.

4 Q. And you mentioned the Coconut Grove  
5 Ministerial Alliance?

6 A. Uh-huh.

7 Q. And the Homeowners and Tenants Association  
8 West Grove Task Force.

9 Is that one organization, or were those two  
10 organizations?

11 A. I'm sorry. Which organizations?

12 Q. Start with, I guess, what's the full name  
13 of the Coconut Grove Ministerial Alliance?

14 A. That's the full name.

15 Q. That's the full name?

16 A. Yes, sir.

17 Q. And the Homeowners Association -- or  
18 Homeowners and Tenants Association of West Grove Task  
19 Force, is that what I'll call HOTA; H-O-T-A? Is that the  
20 name of that organization?

21 A. No.

22 Q. Okay. What is the name of that  
23 organization?

24 A. The name of the homeowners and tenants  
25 association is the West Grove Homeowners and Tenants

1 Association.

2 Q. Okay. And together, both of those  
3 organizations formed the West Grove Task Force?

4 A. Along with churches, civic groups,  
5 nonprofit organization, small business owners, residents  
6 and ten- -- and I'm sorry, homeowners and tenants all met  
7 together to form the task force.

8 Q. Okay. The next question, a couple of  
9 questions that I'm going to ask, I want to be careful  
10 that what I'm asking you is when and how long you met  
11 with your attorneys. I don't want you to share anything  
12 related to your conversations.

13 So let's start with the first question: In  
14 preparation for your deposition today, when did you meet  
15 with your attorneys?

16 A. Yesterday.

17 Q. Did you have any meetings with them before  
18 then, in preparation for this deposition?

19 A. No.

20 Q. And about how long was your meeting  
21 yesterday?

22 A. About an hour.

23 Q. And just to clarify, other than your  
24 attorneys, you haven't spoken to anyone else in getting  
25 ready for your deposition today?

Page 13

1           A.     No. I haven't spoken to anyone else to  
2 prepare.

3           Q.     Did you talk to Ms. Cooper just about --  
4 not in preparation for this, but did you talk to her at  
5 all about her deposition?

6           A.     No.

7           Q.     Okay. What about Ms. Donaldson?

8           A.     No.

9           Q.     When was the last time that you would have  
10 spoken to Ms. Donaldson?

11          A.     Oh, maybe over -- maybe a month or over a  
12 month ago.

13          Q.     What about Ms. Cooper?

14          A.     Longer.

15          Q.     Okay.

16          A.     Yeah, I'm pretty busy so I don't get -- I  
17 don't have a lot of time.

18          Q.     And what does it take to become a member of  
19 GRACE?

20          A.     The desire. The desire to be a member.

21          Q.     So if I wanted to become a member of GRACE,  
22 what would I need to do to become a member?

23          A.     Fill out an application, and that  
24 application would go before the board of directions, and  
25 the board of directors would vote to allow an organization

Page 14

1 in.

2 Q. You referenced that it would "allow an  
3 organization in."

4 If I'm an individual like the homeowner or  
5 tenant that has property in the Grove, can I become a  
6 member?

7 A. You can. Yes, you can.

8 Q. Okay. Would I fill out the same  
9 application?

10 A. No.

11 Q. Okay. Would there be a different  
12 application?

13 A. No, I don't think there are applications  
14 for individuals as members; only applications for  
15 organizations.

16 Q. So if I was an individual, what would I  
17 need to do?

18 A. Participate in the meetings.

19 Q. Do I need to pay any fees?

20 A. No.

21 Q. As an organization, do I need to pay any  
22 fees?

23 A. No.

24 Q. Is it the same application for all  
25 organizations that want to become a member?

Page 15

1 A. Yes.

2 Q. Okay. And would the organizations that  
3 would qualify for that process include churches?

4 A. Churches qualified to be members, yes.

5 Q. Would it include businesses?

6 A. Yes.

7 Q. And would it include nonprofit  
8 organizations?

9 A. Yes.

10 Q. Are there any other types of organizations  
11 that would apply there?

12 A. Civic groups.

13 Q. Anything else?

14 A. Not that I can think of, no.

15 Q. And what is the purpose of GRACE?

16 A. To -- the purpose of GRACE is to protect  
17 Black homeowners and tenants in West Coconut Grove who  
18 are at risk of displacement, eviction or resegregation,  
19 to restore the rights of those who have been wrongfully  
20 displaced, to preserve the community, the culture and  
21 history of West Coconut Grove and its people and to  
22 advocate for equitable, economic development.

23 Q. And would it be fair to say, from your  
24 description, that the primary focus of GRACE is the West  
25 Grove?

Page 16

1 A. Yes.

2 Q. And you mentioned addressing the rights of  
3 those who were displaced from the Grove.

4 How does it go about doing that?

5 A. Well, that's a long response. So we, with  
6 the help of -- of counsel and other organizations,  
7 created a map of people who were displaced. We do  
8 surveys of former addresses, and we were able to locate  
9 them. And we created a CGI map of where those persons  
10 went. We reached out to them, connected with them. And  
11 once we gathered the data, we started by going to the  
12 different departments within the city and using the Fair  
13 Housing Act to see that the City of Miami was in  
14 compliance with the Fair Housing Act when those persons  
15 were evicted, displaced and/or resegregated into other  
16 hypersegregated communities.

17 Q. Okay. And you'd mentioned that that would  
18 apply to the ones who were wrongfully displaced.

19 Did I understand that correctly?

20 A. Yes.

21 Q. What are circumstances that a Black  
22 resident would have been wrongfully displaced?

23 A. The City of Miami approved, they call them,  
24 Special Area Plans now. Before they were Special Area  
25 Plans, they were called MUSP, Major Use Special Permits.

1                   And so, property owners who owned  
2 properties that housed multiple residents -- residents or  
3 tenants, they were able to get Major Use Special Permits,  
4 and they got those permits. They needed to remove their  
5 tenants so that they could demolish their buildings. And  
6 so, GRACE in -- in another lawsuit -- or in another  
7 complaint rather -- another complaint; not lawsuit.

8                   In another complaint we, you know, we  
9 complained that proper -- the proper processes weren't  
10 followed to remove those tenants, that they were  
11 improperly and illegally evicted.

12                  Q.     And is that litigation still ongoing?

13                  A.     The complaint is still being processed by  
14 the Housing and Urban Development.

15                  Q.     Now talking about the 2022 redistricting  
16 process.

17                  What is your understanding, and I use the  
18 term 2022 -- what is your understanding of when the City  
19 kicked off its redistricting process after the 2020  
20 census?

21                  A.     What is my understanding of the process?

22                  Q.     What is your understanding of when it  
23 kicked off? Just when did they start drawing maps after  
24 the 2020 census?

25                  A.     I -- I don't know exactly when that took

Page 18

1 place.

2 Q. Did Grace's board meet and discuss how they  
3 would engage in the city's map drawing process?

4 A. Initially -- eventually, yes, but  
5 initially, when the process kicked off, no, we did not  
6 discuss how we would participate in -- in the process, in  
7 the map drawing process.

8 Q. And at some point in time, did GRACE make  
9 the decision that it needed to engage with the city on  
10 the map drawing process?

11 A. Yes.

12 Q. How did that come about?

13 A. In a community meeting, our commissioner  
14 informed the community that maps that -- you know, we  
15 were going -- the city was going through the  
16 redistricting process, and I believe once we -- if I  
17 remember correctly, once we learned what the new maps  
18 would look like or what the proposed maps would look  
19 like, then there was a meeting -- a subsequent meeting  
20 where our board decided that we needed to be more  
21 involved.

22 Q. Did they have a vote for that meeting?

23 A. I don't believe there was a vote,  
24 initially, because it was a query; it was factfinding.  
25 So I don't believe at the initial meeting where we said,

Page 19

1       hey, let's -- let's get more involved, let's see what's  
2       going on. So I don't believe there was a vote at that --  
3       at the initial meeting.

4           Q.     Does Grace's board keep board meeting  
5       minutes?

6           A.     Yes.

7           Q.     Okay. Do you know if board meeting minutes  
8       were kept for that meeting?

9           A.     I'm pretty sure they were.

10          Q.     Do you recall roughly when that meeting  
11       was?

12          A.     I don't.

13          Q.     Let me see if I can help us narrow it down.

14                   I'll represent that the city started its  
15       redistricting with its first public meeting on November  
16       18th, 2021. And there was a meeting in December 2021.  
17       And if I'm correct, I believe the first public meeting  
18       where maps were released would have been February 7th of  
19       2022.

20                   Do you recall within that time line where  
21       GRACE might have had a board meeting that discussed?

22          A.     So not with -- I can't give you a date.  
23       What I can say, that once the proposed maps were made  
24       public and, you know, the community began to respond,  
25       then GRACE met to decide what we were going to do, if it

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1 was something we wanted to pursue.

2 Q. Who was the commissioner that alerted you  
3 at the community meeting?

4 A. That was Commissioner Ken Russell.

5 Q. Did the board take votes or designate  
6 certain individuals to present at committee meetings?

7 A. Which -- which committee meetings?

8 Q. Fair question. Let me see if I can be more  
9 precise.

10 Did the GRACE Board take votes or designate  
11 representatives to attend the city commission meetings  
12 and present information and comment to the city  
13 commission?

14 A. Yes. Mostly designations, but not votes,  
15 but mostly designated people who were available.

16 Q. Would those designations have been made by  
17 the board, or would those have been made by either one of  
18 the officers like the chair or vice chair?

19 A. The board.

20 Q. Okay. Would there be many meeting minutes  
21 that reflected the board's designation of certain  
22 individuals to attend a city commission meeting and  
23 testify on its behalf?

24 A. There should be.

25 Q. How were you selected by the board to be

Page 21

1 the corporate representative to testify today?

2 A. I was the chair of the board during the --  
3 during the process.

4 Q. No good deed goes unpunished, right?

5 MS. MCNAMARA: Do we need an affirmative  
6 yes? Is that a question?

7 MR. LEVESQUE: No, not to that one. I  
8 won't put him on the spot.

9 BY MR. LEVESQUE:

10 Q. Reverand Robinson, I'm going to show you an  
11 exhibit that we're going to mark Defendant's  
12 Exhibit 24-13.

13 (Defense Exhibit 24-13 was marked.)

14 BY MR. LEVESQUE:

15 Q. Reverand Robinson, I'm going to represent  
16 to you that this is a meeting transcript of the city  
17 commission meeting on February 7th, 2022 that was  
18 transcribed by your attorneys and filed with the Court  
19 earlier in the litigation. And what is attached to that  
20 cover page is an excerpt of what I believe your comments  
21 to the commission were on that date.

22 If you wouldn't mind take a moment to look  
23 over that, and when you've had the opportunity to review  
24 it, let me know.

25 A. (Witness reading document.)

Page 22

1                   Okay.

2                   Q.     Okay. Does that accurately reflect your  
3 comments, to the best of your recollection?

4                   A.     Yes, to the best of my -- my memory.

5                   Q.     Okay. Are you still the Senior Pastor of  
6 the Greater St. Paul A.M.E. Church in Coconut Grove?

7                   A.     Yes.

8                   Q.     And how long have you been in that  
9 position?

10                  A.     Six years.

11                  Q.     And how many are in your congregation?

12                  A.     Roughly 300.

13                  Q.     And you indicated at the time all this was  
14 going on you were Grace's chair.

15                  What are the dates for your term, as the  
16 Chair of GRACE?

17                  A.     The foundation date, I believe January of  
18 2019. I believe I was elected at our first meeting. And  
19 I stopped being the chair in this year, January of 2023.

20                  Q.     Now, do the officers of GRACE have set  
21 terms?

22                  A.     Yes.

23                  Q.     And so, would that roughly be a four-year  
24 term then?

25                  A.     It would -- it's three years, according to

Page 23

1 our bylaws.

2 Q. Have your bylaws been amended since they  
3 were first established in 2019?

4 A. I don't think so. I don't remember them  
5 being amended.

6 Q. Now, starting on Line 16 going to Line 18,  
7 you state: "We are facing nationwide voter suppression  
8 and dilution while suppression in the diluting of the  
9 African vote all throughout this country in different  
10 states.

11 When you referenced "voter suppression and  
12 dilution," what were you referencing?

13 A. In -- in the United States and, in  
14 particular, in the State of Florida, we had just, I  
15 believe, experienced a redistricting of the state, which  
16 had impacted Black communities throughout the State of  
17 Florida and diluted the vote. And so, I believe I was  
18 referring to that, as well as we had seen this happening  
19 throughout the country at that time.

20 Q. Specifically related to Florida, are there  
21 specific districts or specific areas where -- that you  
22 had in mind when you made that statement?

23 A. I think I did have them in mind at that  
24 time, but I don't remember now. That was a lot of  
25 thoughts ago.

Page 24

1           Q.     Okay. Well, and let me ask this: At the  
2 time that you made that statement -- sometimes people  
3 will have a belief in their mind and then as time goes on  
4 they might rethink or reconsider or become more convinced  
5 that that's the way they felt or less convinced that  
6 that's the way they felt.

7                 As you sit here today, thinking of what you  
8 might have been referencing in the State of Florida, are  
9 you more convinced or less convinced that there was voter  
10 dilution going on?

11          A.     I'm equally as convinced as I was that day.

12          Q.     Then starting on Line 18 and 19, you state:  
13 "It appears that in the plan that was presented, we would  
14 experience some things similar."

15                 What were you referring to there?

16          A.     I believe that the map that was presented  
17 at that time was separating Coconut Grove into different  
18 parts, into different areas. And so, then the voting  
19 body of Coconut Grove at that time would have been split  
20 into different commission- -- districts, and my  
21 perception, that would be diluting the votes because  
22 they're fewer and, particularly, African American voters,  
23 if they were moved from one district to the other.

24          Q.     Okay. Let's unpack that a little bit.

25                 When a neighborhood is split between

Page 25

1 districts, does that, in your mind, always have the  
2 affect of diluting the influence of the neighborhood?

3 A. Always?

4 Q. Yes.

5 A. No.

6 Q. So there are certain circumstances that you  
7 would recognize where splitting a neighborhood might give  
8 them better representation, wouldn't you?

9 A. That's possible.

10 Q. Sometimes that might depend on the  
11 influence of who the representative is.

12 You would agree with that, wouldn't you?

13 A. I -- I don't quite understand. I might  
14 need to hear that question again.

15 Q. Sure. We'll use Congress as an example.

16 A. Okay.

17 Q. You might have a representative that was  
18 from your district or your neighborhood that's a member  
19 of one party, and then you might have, you know, part of  
20 your neighborhood representing somebody that's in the  
21 other party. Whatever representative that is in the  
22 controlling party probably going to have better influence  
23 than the minority party, as a general rule.

24 Would you agree with that?

25 A. So I -- I -- this question is difficult for

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1 me to answer with that example because we are nonpartisan  
2 in the City of Miami.

3 Q. Well, let me ask you this: Commissioner  
4 Russell fought to keep Coconut Grove as one single unit,  
5 correct?

6 A. Uh-huh.

7 Q. Commissioner Russell ultimately was  
8 unsuccessful in doing that, correct?

9 A. Yes. Commissioner Russell did fight for  
10 Coconut Grove, and at this point Commissioner Russell was  
11 unsuccessful.

12 Q. Thank you.

13 MR. LEVESQUE: Madam Court Reporter, sorry  
14 about that.

15 BY MR. LEVESQUE:

16 Q. So that would be an example where even  
17 though you had a representative -- well, let me -- before  
18 I ask that question, were you satisfied with Commissioner  
19 Russell as your representative?

20 A. Sometimes.

21 Q. Fair enough.

22 In the 2013 plan, so before they did  
23 redistricting, what district did the members of GRACE  
24 reside/operate in?

25 A. District 2.

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1 Q. District 2.

2 Did the members of GRACE feel that they  
3 were placed into District 2 because of their race or  
4 their mission to help support and protect the Black  
5 community?

6 A. No. GRACE felt that it was in District 2  
7 because that's where the boundaries of District 2 were.

8 Q. And the boundaries had been there for quite  
9 a while, correct?

10 A. I believe from -- since 2013, I believe.

11 Q. And District 2 was generally a coastal  
12 district for a good while, even before 2013.

13 Would you agree with that?

14 A. I -- I don't know.

15 Q. You mentioned you were born in Tallahassee.

16 When did you move to Miami?

17 A. I moved to -- well, so I first -- I was  
18 born in Tallahassee. I moved to Miami when I was less  
19 than a month old.

20 Q. Okay.

21 A. That was the initial move. I moved away,  
22 and I moved back to Miami in 1999.

23 Q. All right. And between Tallahassee and  
24 Miami where were you? You said you moved back to Miami  
25 in 1999.

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1                   At some point did you move back to  
2 Tallahassee or --

3                   A.       I moved back to Tallahassee, I moved to  
4 Jacksonville, I moved to Orange Park, Florida, I moved to  
5 Tampa. I lived in a lot of -- I lived in -- all over  
6 Florida.

7                   Q.       Okay. Very good.

8                   Now going back to your statement where you  
9 say, "it appears that in the plan that was presented we  
10 would experience something similar" --

11                  A.       Uh-huh.

12                  Q.       -- you mentioned the breaking up the Grove.

13                  Did you have a problem with breaking up the  
14 Grove or was it primarily the moving of West Grove into  
15 what would be District 4?

16                  A.       At -- at the time of this statement, you  
17 know, representing GRACE, our focus was on West Grove at  
18 the time of this statement.

19                  Q.       Okay. And so, would it be fair to say that  
20 at the time of that statement, if you stood up and told  
21 the city commission, we want the West Grove back in to  
22 District 2, and they said Representative Robinson --  
23 Reverand Robinson, I'm sorry if I denoted you there --  
24 Reverand Robinson, you're right, we're going to do that,  
25 we're going to take care of you, and we're going to move

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1 the Grove back into District 2, would GRACE have been  
2 fine?

3 A. If that -- you know, I don't know. We  
4 would've had to go on -- you know, that would have been a  
5 vote of the -- of the -- the body. So as a -- as a  
6 single representative, I don't know what we would have  
7 done, if that would have happened. But, you know -- but  
8 that's -- at the time of this statement, we were  
9 concerned about West Grove.

10 Q. Was that your only concern at that time?

11 A. Was what my only concern?

12 Q. Well, when you were talking about voter  
13 suppression and dilution, was it only the movement of  
14 West Grove out of District 2, or were there other  
15 concerns with the city's redistricting plan that you had  
16 concerns about?

17 A. So no other concern right away. I know  
18 one -- at least one other concern was that the -- the  
19 opinions or -- of the community had not been taken into  
20 consideration, so that was -- that was a concern for us.

21 Another concern was that other communities  
22 of interest in other neighborhoods were not -- that  
23 were -- that some other communities of interest and  
24 neighborhoods were kept together in the draft that they  
25 presented that day, but in oth- -- in some areas, that

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1 was not taken into consideration. So I think at that  
2 time, I was representing the lack of equity in the  
3 separation of neighborhoods.

4 Another concern was the natural boundaries  
5 weren't used. Another concern, which I say in this  
6 statement here, was that the village council had not been  
7 taken into consideration. I was also concerned that  
8 NCD-2, which is a part of Miami 21, had not been taken --  
9 it didn't appear to have been taken into consideration in  
10 the draft, and we were also concerned at that time that  
11 the community redevelopment agency that was in the  
12 process of being newly formed would have been split into  
13 multiple commissionned districts and would have had  
14 representation of more than one commissioner. And so, we  
15 thought we had a challenge, to get things done. So there  
16 were a number of concerns.

17 Q. Regarding the opinions of the community, do  
18 you know if at some point meetings were held in the  
19 community, workshopping the maps?

20 A. I don't recall a workshop being held in the  
21 community. I recalled -- I recall kind of a Q & A and  
22 informational type of session being held in the  
23 community.

24 Q. As part of that Q & A and information  
25 session, was it also a listening session where the public

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1 was given the opportunity to present their ideas?

2 A. In District 2, yes.

3 Q. And did you attend those meetings?

4 A. I don't remember attending but only but one  
5 of those meetings and for a short period of time.

6 Q. Do you know if there was more than one?

7 A. I believe there were, but I don't remember.

8 Q. Do you know if the members of GRACE were  
9 able to attend those meetings?

10 A. I'm sure that if there was a meeting in the  
11 West Grove that members of GRACE were there.

12 Q. Do you know if members of GRACE presented  
13 their ideas and opinions?

14 A. I don't -- I don't remember. I don't  
15 remember.

16 Q. What is your understanding of why the city  
17 had to redraw districts?

18 A. It -- it's a part of state law I believe.  
19 Every ten years, the city has to reevaluate, you know,  
20 based on census, based on -- you know, in order to keep  
21 parity within the city so that there's an equitable  
22 representation that this is something that has to be done  
23 every ten years.

24 Q. And do you know how many city districts  
25 there are?

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1           A.     In the City of Miami, there are five  
2 districts.

3           Q.     Okay. And do you know whether any of the  
4 districts were out of whack for population reasons?

5           A.     Can -- you define "out of whack"? I just  
6 want to make sure --

7           Q.     Fair enough. I knew as soon as I said it  
8 that was going to be an issue.

9                   Were you aware of whether any districts  
10 were not equal in population, that they had to be  
11 redrawn?

12          A.     I was aware of that, that there had been  
13 population increase in some districts more than others.

14          Q.     Okay. Do you know which districts had  
15 experienced the population increase that would require  
16 them being redrawn?

17          A.     Well, I do know that at that time  
18 District 2 had experienced an increase.

19          Q.     Were you aware that District 2 had the  
20 largest increase?

21          A.     Yes.

22          Q.     Were you aware that District 2 was the only  
23 district that was overpopulated?

24          A.     Yes.

25          Q.     And all four of the other districts were

1 underpopulated?

2 A. I did not know they were underpopulated,  
3 but, I guess, it makes sense, deductively.

4 Q. What is your understanding then of what had  
5 to happen to District 2, to equalize population?

6 A. It's complicated to answer because I didn't  
7 understand that there only needed to be something done to  
8 District 2. I understood that they were all -- all  
9 districts were -- it was all moving parts, you know, to  
10 kind of -- to balance things out. So I didn't understand  
11 that only District 2 needed to do something, but that  
12 all of the districts needed to work in concert to try to  
13 make this work.

14 Q. Are you familiar with how many districts  
15 border District 2?

16 A. There were definitely five. I think  
17 three -- three districts bordered 2, uh-huh.

18 Q. You'd mentioned "NCD-2."

19 What is NCD-2?

20 A. Neighborhood Conservation District.

21 Q. And what is that, as it relates to Coconut  
22 Grove?

23 A. It is a protection, if you will, that's put  
24 in place to preserve history. It has restrictions for  
25 development and the requirements for zoning changes and

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1 things that -- that are different from other parts of the  
2 city.

3 Q. Okay. And is NCD-2 currently in place?

4 A. To my knowledge, yes.

5 Q. And you mentioned that a CRA was in the  
6 works.

7 Has the CRA been finalized?

8 A. No.

9 Q. And what areas would be covered by -- we'll  
10 start with NCD-2.

11 Did that cover the entirety of Coconut  
12 Grove?

13 A. No.

14 Q. What area did it cover?

15 A. I don't have a map in front of me, but --  
16 so I don't know exactly what areas it covered, but there  
17 was definitely a portion of Coconut Grove.

18 Q. The portion of Coconut Grove that it did  
19 cover, was it in the West Grove?

20 A. Yes, I believe of West Grove -- I'm not  
21 sure if it's the entirety of West Grove, but I do know  
22 that it's -- quite a bit of West Grove is in NCD-2.

23 Q. And are any parts of NCD-2 outside of West  
24 Grove?

25 A. I don't -- I don't know. It's possible but

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1 I don't know.

2 Q. Do you know what -- I'll rephrase that.

3 For your purposes, what would you describe  
4 the boundaries of West Grove?

5 A. You know, that's hard because that changes  
6 depending on who you're talking to, but as a  
7 representative of GRACE, I think what we considered to be  
8 West Grove was Douglas Road on the -- I guess, that would  
9 be the south. You know, West Grove is sort of difficult  
10 to describe. So, I guess, that's the southern border;  
11 Douglas Road, you know, all of the way up to U.S. 1 on  
12 west. So it's now it's kind of weird that's northeast  
13 U.S. 1, Douglas Road. I guess, 32nd Avenue and McDonald  
14 -- McDonald, and I don't know how far back we go to the  
15 east or southeast, but in those -- it's in there  
16 somewhere.

17 Q. Okay. Are you aware of any official  
18 designation of what constitutes West Grove?

19 A. No official designation, that I know of.  
20 And can I retract something?

21 Q. Sure.

22 A. Because I forgot about Armbrister Park and  
23 all that stuff way down there. I guess, that would  
24 Brooker Street, you know, bordering Coral Gables, so I'm  
25 even missing some now, but all of those things, all of

1 that -- those neighborhoods.

2 Q. And we'll go back to my question.

3 Are you aware of any official designation  
4 that would constitute West Grove?

5 A. I'm not aware of any official designation.

6 Q. Are you aware of any official designation  
7 for Coconut Grove?

8 A. I think it's -- I think there's a sign that  
9 says Coconut Grove, so I think that's official.

10 Q. Okay. But are you aware of anything that  
11 officially establishes what the boundaries for Coconut  
12 Grove are?

13 A. I don't know that there's something that  
14 officially establishes boundaries for Coconut Grove, for  
15 West Coconut Grove.

16 Q. Well, and I just want to be clear; when you  
17 say "West Grove," is that the same as West Coconut Grove?

18 A. Yes. When I say "West Grove" or "West  
19 Coconut Grove," I'm using those interchangeably.

20 Q. Okay. Great.

21 In the standpoint of Coconut Grove broadly,  
22 it's my understanding there's the West Grove and then  
23 there are other parts of Coconut Grove.

24 What are the other parts of Coconut Grove  
25 that you would recognize?

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1           A.     Well, unofficially, North Grove, East Grove  
2 Center Grove, South Grove.

3           Q.     Are there any other parts?

4           A.     Recently, there's Little Bahamas of Coconut  
5 Grove.

6           Q.     And is that something that would be in  
7 addition; like an additional geographic area other than  
8 North, East, Center and Southwest or is it something that  
9 might sit on the lines or sit within one of those other  
10 five that we've already talked about?

11          A.     I'm pretty sure it sits within. I just  
12 don't know where.

13          Q.     Okay. Is it fair to say that the issues  
14 that GRACE works on in the West Grove are not really  
15 issues that are a problem in either North, East, Center  
16 or South Groves?

17          A.     Not all the time. It's not fair to say  
18 that all the time.

19          Q.     What about most of the time?

20          A.     It depends on the issue. It depends on the  
21 issue.

22          Q.     Well, are the areas of North, East, Center  
23 and South Grove generally characterized by higher  
24 property values?

25          A.     Yes.

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1 Q. Residents with higher personal incomes?

2 A. So here's where it's tricky because, you  
3 know, in the West Coconut Grove, there are very wealthy,  
4 you know, very famous attorneys and basketball players  
5 and all who have homes -- baseball players, you know, so  
6 it's hard to say that because, you know, West Coconut  
7 Grove is so diverse.

8 Q. Well, do you have the same type of  
9 diversity in the North, East, Center and South Groves?

10 A. I can't -- I wouldn't know. I can't speak  
11 to it.

12 Q. All right. Now, going back to your  
13 statement on Line 22 -- actually, 21 and 22 is addressing  
14 the chairwoman. You say, "We do appreciate that, but as  
15 it relates to substance, it appears that what was  
16 presented today intentionally discriminate and  
17 desperately impacts the voting rights of the Village West  
18 Black residents by diluting their political impact.

19 What aspects of that plan do you believe  
20 were intentional discrimination?

21 A. Moving -- and it was based on the report  
22 that was given by the consultant. There were numbers I  
23 think that were mentioned in that report. And there were  
24 Black voters that would be moved to a district where they  
25 would be the overwhelming minority in that voting body.

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1 And so, you know, by definition, that's dilution of  
2 votes.

3 Q. And when you say "by definition that's  
4 diluting of votes," where do you get -- what's your basis  
5 for making that statement?

6 A. What do you mean, what's my basis?

7 Q. Did you read that in a case? Did you hear  
8 that on the news? I guess, where is your source of  
9 information for making this statement that that's the  
10 definition of dilution?

11 A. I don't -- I don't recall exactly where I  
12 read it, but with all that was happening in government at  
13 that time, with redistricting and the state, you know, I  
14 read so much material. And so, at that particular time,  
15 I think I was -- what was fresh in my mind was packing,  
16 fracking, all of these -- this voter terminology that I  
17 was familiar with at that time. I've read probably a  
18 hundred books since then. But at that time, what was  
19 fresh in my mind was were those upon packing, fracking,  
20 you know, dilution of votes. So I was pretty -- that's  
21 what -- I think that was my basis at the time.

22 Q. Do you know what percentage of voters  
23 Blacks constituted in District 2?

24 A. I don't.

25 Q. Do you know if they were 30 percent of

1 District 2?

2 A. I -- I don't remember that. I don't know  
3 the -- the percentages.

4 Q. Do you know what the race of Commissioner  
5 Russell was?

6 A. I think he was proud that he was Japanese.  
7 He was very proud to share that quite often.

8 Q. Do you know if his fellow commissioners  
9 identified him as Japanese?

10 A. I'm not sure how -- how they identified  
11 him. I re- -- I don't know how they identified him,  
12 personally.

13 Q. Do you know how he identified himself on  
14 his campaign materials?

15 A. I don't.

16 Q. Do you know the race or ethnicity of the  
17 current commissioner for District 2?

18 A. Yes.

19 Q. Who is currently the commissioner of  
20 District 2?

21 A. Sabina Covo.

22 Q. And what is her race or ethnicity?

23 A. She's Colombian, of Colombian descent.

24 Q. Okay. Does that make her also Hispanic?

25 A. Sure, yes.

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1 Q. Did you have a problem with being  
2 represented by a Hispanic commissioner?

3 A. No.

4 Q. Are you aware that the commissioner in  
5 District 4 is a Hispanic commissioner?

6 A. Which commissioner is that again?  
7 District 4 is -- yes.

8 Q. Do you recall who the commissioner of  
9 District 4 is?

10 A. I believe that's Manolo Reyes.

11 Q. Do you have a problem with being  
12 represented with -- I mean, let me back up.

13 Generally speaking, unless I indicate  
14 otherwise, when I say "you," I'm referring to you --

15 A. As GRACE?

16 Q. -- as -- yes.

17 A. Yes.

18 Q. Does GRACE have a problem with its members  
19 being represented by Commissioner Reyes?

20 A. GRACE doesn't have a problem with the  
21 community being represented by the commissioner that they  
22 had to vote for.

23 Q. Well, was there anything about any of the  
24 plans that had been considered by the city that would  
25 deprive any of G.R.A.C.E.'s members that can vote of the

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1 ability to vote?

2 A. The ability to vote? No, it doesn't  
3 deprive anyone of the ability to vote.

4 Q. Okay. Is there anything about the plan  
5 that discourages them from voting?

6 A. Based on community meeting conversations,  
7 yes. When people learned that they were moving out of  
8 District 2 into another district and they believed that  
9 their votes would be diluted because there would be  
10 another population that would be represented well more  
11 than them, they were discouraged from voting.

12 Q. Let me ask this: Do you know if the Black  
13 residents in West Grove, if they were in District 2 or  
14 District 4, whether they would have been the minority  
15 population for that district?

16 And when I say "minority population," I  
17 don't mean racial minority; I mean, minority in terms of  
18 numbers.

19 A. The Black voters would have been the  
20 minority in whatever district they were in, I believe,  
21 other than District 5.

22 Q. Okay. And so, no matter which district  
23 they were anything to be in, they were going to be a  
24 smaller proportion of the race in that district, whether  
25 it's a small portion of Blacks in District 2 or a small

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1 portion of Blacks in District 4.

2                   Would you agree with that?

3                   A.     Yes, that's true, and that was the major  
4 concern because you take an already minority group and  
5 make them even smaller by splitting them into two  
6 different districts, so I think that was the main  
7 concern.

8                   Q.     Is it your understanding that they were  
9 splitting the West Grove or splitting Coconut Grove when  
10 they moved those portions of West Grove into District 4?

11                  A.     Well, with the information that I have now,  
12 Coconut Grove was being divided or split in multiple  
13 areas and multiple districts, but as it relates to  
14 District 4, what I believe -- that first draft, and I'm  
15 not looking at it, and at the time of this transcript, my  
16 focus was West Coconut Grove.

17                  Q.     And what is the basis -- going back to your  
18 statement.

19                  What is the basis for your assertion that  
20 they were intentionally moving the West Grove because of  
21 their race?

22                  A.     I think at that time I was representing the  
23 consensus of GRACE and its members, and that's just --  
24 that's what we believed at that time, you know, after --  
25 after, you know, assessing it, that's -- that was the

1 belief of the body at that time.

2 Q. Well, was there anything in terms of  
3 objective evidence or statements from commissioners that  
4 gave you that impression, or was it just a feeling?

5 A. Well, after this comment, yes, the  
6 commissioners made multiple statements that corroborated  
7 our belief, so --

8 Q. Sorry, I didn't mean to cut you off.

9 A. No, it's okay. I'll stop there.

10 Q. If you have more to say, I want to hear it.

11 A. No, no. I'm good.

12 Q. Okay.

13 A. Thank you.

14 Q. So the statements you're referencing, are  
15 you referring to the fact that they talked about, you  
16 know, having three Hispanics districts, a Black district  
17 and an Anglo district?

18 A. That's some of it.

19 Q. Okay. What else, other than that?

20 A. I believe I remember one -- one  
21 commissioner literally saying, we gerrymandered the  
22 districts so that we can keep Latino or Cuban  
23 commissioners in certain districts. And so, there was  
24 even specificity with what nationality of Latino would  
25 represent districts. So that just kind of reinforced

1 what we were thinking.

2 Q. Do you recall which commissioner said that?

3 A. Oh, my gosh process of elimination. It  
4 wasn't Russell, of course. It wasn't de la Portilla, it  
5 wasn't King, it wasn't Reyes. It was -- I cannot recall  
6 his name. . .

7 Q. Carollo?

8 A. It was Commissioner Carollo. Thank you for  
9 helping me.

10 Q. And you referenced there that he made the  
11 statement that he wanted to elect Latino/Cuban.

12 Are those two different, or do you use  
13 those interchangeably, or is that a particular name for a  
14 subdivision of Hispanic?

15 A. They are different.

16 Q. Okay. So Latino and Cuban are different?

17 A. Well, I mean, you know, Cubans -- Cuban --  
18 people of Cuban descent are Latino, but I believe when  
19 the commissioner spoke, that they meant something  
20 different; that they meant that they needed Latino  
21 representation, and some districts, no matter what  
22 ethnicity or where they were from, and that in other  
23 districts, that they wanted specifically Cuban  
24 representation.

25 Q. Okay. Do you believe that there is a way

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1 to draw the city that doesn't have three Hispanic  
2 commissioners, a Black commissioner, and what I'll call a  
3 plurality commissioner?

4 A. And I don't know, and that -- that has  
5 never been our intent or goal. I mean, and I don't want  
6 to say this disrespectfully, but we didn't care about the  
7 race of -- how the maps were drawn in a way that  
8 reflected what race a person was. We just wanted people  
9 to be able to elect who they wanted and that it be done  
10 in an equitable way.

11 And so, if they're Latino, if they're  
12 German, if they're -- wherever they're, from we thought  
13 every district should be able to decide, and the map  
14 shouldn't be gerrymandered in a way that there has to be  
15 people from certain races.

16 Q. So is it your testimony today on behalf of  
17 the G.R.A.C.E organization that you didn't have a concern  
18 about being placed in a Hispanic district or a plurality  
19 district or even a Black district, you would've been fine  
20 with whatever, so long as the line wasn't set there  
21 because of race?

22 MS. McNAMARA: Objection to form.

23 You can answer.

24 A. I believe that GRACE was -- didn't  
25 characterize the districts as Latino or Anglo or Black,

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1 but GRACE understood the dist- -- the commission  
2 districts to be commissioned districts, and that as long  
3 as the members of the district had an equal and fair  
4 opportunity to elect who- -- whomever they wanted to  
5 elect that was what was of greatest importance to us.

6 BY MR. LEVESQUE:

7 Q. Well, again if Grace's members can still  
8 vote, their vote is with equal population. Their vote is  
9 generally going to be the same if they're voting in  
10 District 2 or District 4 or District 3 or District or  
11 District 5, correct?

12 A. I don't believe that to be correct.

13 Q. Okay. What are the circumstances where  
14 their vote would count more; what are the circumstances  
15 where their vote would count less?

16 And I'll go ahead and object for your  
17 counsel about the compound question.

18 We'll start with the first one.

19 What are the circumstances where GRACE  
20 might have their vote count more?

21 A. The circumstances where the mem- -- the  
22 members of the community and member organizations  
23 represented by GRACE would have their vote count more is  
24 if they are voting within the same district; not  
25 necessarily for a race or -- you know, but it would count

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1 more if people who lived within a certain neighborhood  
2 could vote together.

3 Q. And the force that you're talking about  
4 there is block voting?

5 A. No, not by definition, no.

6 Q. Okay. Well, let me ask this: If you have  
7 folks in a neighborhood everybody's voting but they're  
8 voting differently.

9 A. Uh-huh.

10 Q. Is their voice stronger or weaker?

11 A. If everyone is in the same neighborhood and  
12 they're voting differently, does it strengthen or weaken  
13 their voice?

14 Q. Yeah.

15 A. I think it's equitable. We're in the same  
16 neighborhood, we can vote however we want. I think that  
17 doesn't strengthen or weaken.

18 Q. Okay. And that's true if you're in  
19 District 2?

20 A. Right.

21 Q. You can vote however you want. If you're  
22 in District 4, you can vote however you want. I'm having  
23 a hard time seeing where the voter harm is if you're able  
24 to vote and you can vote however you want in District 2  
25 and you can do the same thing in District 4.

1                   What's the difference?

2                   A. I think when, you know, you look -- looking  
3 at the demographics of those districts, I think when  
4 you -- you know, if you take a group of people who live  
5 in a certain neighborhood and share interests with, you  
6 know, a community and then you put them into a district  
7 where they don't share interests, don't really have the  
8 same challenges as the group where they're being placed,  
9 then I think that weakens the vote or weakens their voice  
10 because they have -- they don't have the same interests,  
11 and they don't share the same neighborhoods as the people  
12 in the new district.

13                  Q. And you'll have to forgive me. You  
14 mentioned some famous sport stars that live in Coconut  
15 Grove. I should probably know this.

16                  What are some famous sport stars that live  
17 in Coconut Grove?

18                  A. Oh, man, I don't -- do I have to name them?  
19 I would rather not answer that question.

20                  Q. Well, I'm not looking to pay them a visit.

21                  A. Okay.

22                  Q. You would agree that an athlete that lives  
23 in, say, the North Grove, to pick an area, I don't know  
24 if that's right or not, but an athlete that lives in the  
25 North Grove is probably not going to experience the same

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1 type of problems and same type of issues that somebody  
2 who lives in the West Grove experiences, where they might  
3 have, you know, a property owner trying to evict them,  
4 correct?

5 A. Again, that's a challenging question for me  
6 to answer, so I'll try the best I can.

7 Athlete or not, anyone who owns a home in  
8 any part of the Grove would not experience the same  
9 issues as a tenant who has a home own- -- as an owner  
10 trying to evict them in any part of Coconut Grove or any  
11 part of the city. So -- so my answer to the question is:  
12 Yes. But however, I think those conditions apply to  
13 anybody; not just an athlete. Or anybody living in any  
14 part of the City of Miami; not North Grove or West Grove.

15 Q. Okay. Okay.

16 Reverand Robinson, I'm just going to give  
17 you what we're going to mark as Defendant's Exhibit 23.

18 (Defense Exhibit 23 was marked.)

19 A. Thank you.

20 BY MR. LEVESQUE:

21 Q. Do you recognize that document?

22 A. I've seen -- I think I've seen this, yes.

23 Q. Okay. I'll represent to you that that is  
24 the First Amended Complaint that was filed on behalf of  
25 GRACE and other plaintiffs.

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1                   If I could ask you to flip to Page 4.

2                   A.     Okay. I'm on Page 4.

3                   Q.     Okay. And the last sentence on that page,  
4 it says: "Grace's members, most of whom are Black,  
5 reside in commissioned Districts 2 and 4."

6                   Does GRACE keep a list of its individual  
7 homeowner and tenant members?

8                   A.     Do we keep a list of -- yes, we have a  
9 list.

10                  Q.     Okay. Did anybody with GRACE go through  
11 that list -- well, let me back up.

12                  Does that list include their residential  
13 address?

14                  A.     Members, yes.

15                  Q.     Okay. Did anybody from GRACE go through  
16 and figure out, yes, we've got somebody in District 2?

17                  A.     Yes, I believe so, yes.

18                  Q.     Who did that?

19                  A.     I think it was an action of the board, I  
20 believe.

21                  Q.     Okay.

22                  A.     Yeah.

23                  Q.     So that would be reflected in the board  
24 meetings minutes?

25                  A.     If -- if we -- if we did, it should be.

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1           Q.     Okay. And did anybody go through the list  
2       of residential addresses and say, we also have somebody  
3       in District 4?

4           A.     I believe so, yes.

5           Q.     Okay. And, again, that would be in the  
6       board minutes?

7           A.     Yes, I -- it should be.

8           Q.     If I could ask you to flip to Page 6.

9                   In Paragraph 30, it says, "The enacted plan  
10      places Plaintiffs Cooper, Johnson and Valdez and  
11      organizational plaintiffs members in districts where they  
12      are not the predominant racial group."

13                  For District 2, do you know what the  
14      predominant racial group is?

15           A.     District 2 is so diverse, I don't know.

16           Q.     Okay. Would it be fair to say that there's  
17      not a majority racial group in District 2?

18           A.     I don't know.

19           Q.     Would it surprise you if there's not a  
20      majority racial group in District 2?

21           A.     No, because Miami is -- is interesting.

22      You know, Miami is a majority minority city and county,  
23      so that wouldn't be surprising.

24           Q.     Most of your members are Black, correct?

25           A.     Yes, most.

1 Q. Is GRACE complaining because it's Black  
2 members were not placed in any Black district?

3 A. No.

4 Q. Would you agree that it's impossible to  
5 place Grace's members in a Black district?

6 A. GRACE doesn't characterize the districts as  
7 -- by race so, I mean, I would have to answer your  
8 question as yes, but I would also answer that with the  
9 understanding that GRACE doesn't characterize districts  
10 as Black or white or whatever.

11 Q. Do you understand that both your attorneys  
12 and counsel for the city agree that the Voting Rights Act  
13 requires the city maps to create an opportunity for at  
14 least one district to elect a Black candidate of choice?

15 A. Yes.

16 Q. We won't get into where we disagree, but  
17 that's good enough.

18 And do you also understand that at least  
19 the Black district, and when I say Black district I mean,  
20 a district that is likely to elect a Black candidate of  
21 choice.

22 And that district is District 5, correct?

23 A. And I would just -- so I do agree, and I  
24 would like to say that because a district elects a Black  
25 commissioner, we -- GRACE doesn't believe that the

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1 district is Black because if that would be the case, then  
2 presently, commissioned District 2 is Colombian, you  
3 know. So we just don't agree that that's how a district  
4 should be classified, but District 5 is the district  
5 that, you know, typically elects Black -- Black  
6 commissioners.

7 Q. I understand perfectly. Another example  
8 might be President Obama.

9 I'm not sure anybody out there would say  
10 that --

11 A. Yeah, America is --

12 Q. -- America is a Black country?

13 A. Correct, correct.

14 Q. So, obviously, there are diversity things  
15 that can occur where someone is from a different race but  
16 still elected by a majority that might be different?

17 A. Correct.

18 Q. So going back to that statement, the  
19 statement is, "Organizational plaintiffs' members are  
20 placed in districts where they are not the predominant  
21 racial group."

22 For GRACE, that's probably going to be  
23 true, no matter who's drawing the map.

24 Would you agree with that?

25 A. Yes.

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1           Q.     And have you examined the maps that were  
2 proposed by plaintiffs in this litigation?

3           A.     Yes.

4           Q.     And you would agree that in all of those  
5 maps, the members of GRACE are not placed in any district  
6 where they are the predominant racial group, correct?

7           A.     Correct.

8           Q.     And you understand "organizational  
9 plaintiffs" there to include GRACE, correct?

10          A.     Yes.

11          Q.     Now, I want you to look at Paragraph 31,  
12 and there's a similar statement, but it has a little bit  
13 of a different twist. "The Enacted Plan places  
14 Plaintiffs Miro and Contreras and Organizational  
15 Plaintiffs' members, in districts where they are the  
16 predominant racial group."

17                 When we're talking about The Enacted Plan,  
18 we're talking about the plan that the commission passed  
19 in 2022.

20                 Would you agree with that?

21          A.     Yes.

22          Q.     And so, my question to you is: Is that an  
23 accurate statement as it relates to G.R.A.C.E.'s members?

24          A.     Well, no, but -- but I believe that the  
25 plaintiffs -- the members -- I'm sorry, that the

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1       Organizational Plaintiffs' members that are being  
2       referred to here is Engage Miami, which is a  
3       predominantly Latino organization.

4           Q.     Okay. If I could refer you back to  
5       Paragraph 24, it says, "If The Enacted Plan is not  
6       enjoined, the members of GRACE, Engage Miami, and the  
7       NAACP Branches (together, 'Organizational Plaintiffs')  
8       will be harmed by living and voting in unconstitutionally  
9       racially gerrymandered districts."

10          A.     Okay.

11          Q.     So the way that I read that is, they have  
12       defined Organizational Plaintiffs to include not just  
13       Engage Miami and the NAACP, but also all of the members  
14       of GRACE, as well.

15               Is that a fair reading of that based upon  
16       that?

17          A.     Well, not in context, no, because in -- in  
18       Line 30 they specify, I think -- I'm sorry, what were we  
19       reading before? Line 30 --

20          Q.     31, yeah.

21          A.     -- 1? Yeah.

22               I think it specifies individual plaintiffs  
23       and refers to the districts that they are in. So I would  
24       read it -- I would understand it as referring to the  
25       districts that those particular plaintiffs and the

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1 organizational plaintiffs that are in those districts  
2 are repre- -- where those groups are represented. That's  
3 how I would read it.

4 Q. Okay. Do you know if Miro or Contreras are  
5 in either Engage or any of the other organizations?

6 A. So this is tough because I call them by  
7 their first names when -- we talk on a first-name basis,  
8 so I don't remember by last name.

9 Q. Okay. Alexandra Contreras?

10 A. Alexander.

11 Q. Alexandra, sorry.

12 A. And what was the question about Alexandra?

13 Q. Do you know if she's a member of Engage  
14 Miami or one of the NAACP organizations?

15 A. I believe Alexandra is Engage.

16 Q. Okay. What about Steven Miro?

17 A. I don't think Steven is a member of any of  
18 those organizations. I think he's just an individual  
19 plaintiff.

20 Q. What is the predominant racial group in  
21 District 4?

22 A. I can't -- I don't know.

23 Q. Okay. Does GRACE have any Hispanic  
24 members?

25 A. Do we have any? So yeah, we have member

1 organizations who have Hispanic members.

2 Q. Okay.

3 A. Yes.

4 Q. So what would be one of those member  
5 organizations that have Hispanic members?

6 A. Greater St. Paul.

7 Q. And there you're referring to the church  
8 that you're a pastor of?

9 A. Yes.

10 Q. So you have Hispanic parishioners?

11 A. Yes. And the West Grove Crime Watch has  
12 Hispanic members and HOTA -- or not HOTA, I'm sorry. The  
13 Ministry Alliance has other churches that have Hispanic  
14 members, so yes, there are Hispanic members within GRACE  
15 membership.

16 Q. I'm sorry.

17 What was the name of the church that you're  
18 a pastor of?

19 A. Greater St. Paul.

20 Q. And what's the full name of --

21 A. Greater St. Paul African Methodist  
22 Episcopal Church.

23 Q. And that's a denomination that has a  
24 longstanding distinguished Black history, correct?

25 A. That's a longstanding distinguished

1 American history, but yes, Black history, as well.

2 Q. And would you identify it as a Hispanic  
3 church?

4 A. No.

5 Q. Okay. And to be clear, it's the church  
6 that's a member, and the church's members would be  
7 indirectly members of GRACE.

8 Would that be a fair characterization?

9 A. No, without indirectly.

10 Q. Without indirectly?

11 A. Yeah.

12 Q. So if you're a member of one of the  
13 organizations, you're automatically a member --

14 A. Yes.

15 Q. -- of GRACE?

16 So one of your parishioners would be able  
17 to come to board meetings and have a voice?

18 A. Yes, and they do.

19 Q. Reverand Robinson, I'm going to show you  
20 what we're going to mark as Defendant's Exhibit 109.

21 (Defense Exhibit 109 was marked.)

22 BY MR. LEVESQUE:

23 Q. Have you seen that document before?

24 A. Yes.

25 Q. What is that document?

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1 A. This is the Supplemental Complaint.

2 Q. If I could ask you to flip to Paragraph 5  
3 on Page 2.

4 A. Okay. I'm at Paragraph 5 on Page 2.

5 Q. Okay. In that paragraph, the last  
6 sentence, it says, "Grace's members, most of whom are  
7 Black, reside in Commission District 2 under the 2023  
8 plan."

9 Now, if I understood your objections to the  
10 earlier versions of the map before the city passed the  
11 2022 plan, your chief objection was the fact that the  
12 West Grove was being moved into District 4.

13 As I read this complaint you're recognizing  
14 that all of your members are now in District 2; is that  
15 fair?

16 A. Can you state the question one more time  
17 for me?

18 Q. Sure: As I read this --

19 A. Uh-huh.

20 Q. -- all your members are in District 2; is  
21 that correct?

22 A. No. All of our members are not in  
23 District 2, but most of them reside in District 2.

24 Q. Okay. Do you have members that are  
25 residing in other districts?

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1 A. Yes.

2 Q. What districts do your members or other  
3 districts do your members reside at?

4 A. I'm not sure. I don't want to say the  
5 wrong thing, but there are members that certainly live  
6 outside of District 2.

7 Q. Do they live within the City of Miami?

8 A. Yes.

9 Q. Has anybody in your organization gone  
10 through and identified which districts your members live  
11 in?

12 A. If we have, I don't remember going -- not  
13 every individual member.

14 Q. Would that something -- would that be  
15 something that would have been directed in a board  
16 meeting?

17 A. Yes.

18 Q. And if it was directed in a board meeting,  
19 would it be in the minutes?

20 A. It should be.

21 Q. And would it fair to say that if it wasn't  
22 in the minutes, it didn't happen?

23 A. I don't think that's fair to say.

24 Q. Okay. When you're conducting your board  
25 meetings and taking minutes, do you normally record the

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1 major actions that are taken?

2 A. Yes.

3 Q. Okay. And so, would it be unusual if a  
4 major action wasn't recorded?

5 A. It would be unusual if something that was  
6 voted on wasn't recorded.

7 Q. Okay. What if something wasn't voted on;  
8 it was just discussed and direction was given?

9 A. That -- that should be recorded.

10 Q. Okay. Is that the type of activity that  
11 normally would have been recorded if the board was  
12 directing somebody to do something?

13 A. It should have -- yes, it should have been  
14 recorded.

15 Q. If I could ask you to flip to Page 3.

16 A. Okay. I'm on Page 3.

17 Q. And Paragraph 17.

18 Is it your interpretation then of the  
19 complaint that Paragraph 17 would not apply to GRACE?

20 A. Yes.

21 Q. But Paragraph 16 would apply to GRACE?

22 A. Yes. And just additionally, from what  
23 we -- the exhibit we looked at earlier, I think the  
24 meeting transcript, which was 24B, I believe, from --  
25 from February of 2022 to the time that we filed the

1 complaint, that -- "we" meaning GRACE filed -- and the  
2 other plaintiffs filed -- filed the complaint, we had  
3 educated ourselves tremendously. We were -- so the focus  
4 at that -- at this point was not only on West Grove. At  
5 this point the focus was on the entire -- all of the  
6 residents in the City of Miami having fair and equal  
7 representation. So -- so we had -- our focus was no  
8 longer just on West Grove when we get to the complaints.  
9 Now the focus was on, we want to do the right thing for  
10 the entire city.

11 Q. Do you know if you have residents in all  
12 the districts of the city?

13 A. I don't know that.

14 Q. Do you know if anybody at GRACE has ever  
15 made any effort to verify if they've got residents in all  
16 of the districts of the city?

17 A. I don't -- I don't -- -- I don't know if we  
18 have. I don't know that we have, but I think that was  
19 our motivation for having conversations with people from  
20 other parts of the city. And -- and after learning that  
21 they felt the same way we did about the maps, they  
22 willingly, or even in some cases asked, could they join  
23 the cases as complainants -- join the case as  
24 complainants -- as plaintiffs.

25 Q. I struggle with it, too.

1                   Let me ask this: In the second sentence of  
2 paragraph 16, it says, "The 2023 plan sent a message that  
3 their commissioner's job is to represent the predominant  
4 group; not them."

5                   I'm going to represent to you that from the  
6 time individual districts were drawn, that the members of  
7 the Black community in District 2, which is where the  
8 West Grove was from 1997 all the way to the present, was  
9 never the predominant racial group in District 2. They  
10 were always the minority.

11                  What changed with the 2022 plan that sent  
12 the message that the commissioner's job was not to  
13 represent them?

14                  A.     So I don't know that that was the message  
15 sent to District 2 or to GRACE in particular; however,  
16 the -- the complaint was filed as a collective and with  
17 the intent of representing all of the residents of the  
18 City of Miami; not only District 2, which is why we have  
19 joint plaintiffs. So these -- you know, these complaints  
20 don't only represent the interest of GRACE, but they  
21 represent the interest of all of the plaintiffs.

22                  So it doesn't -- so it's not specific to --  
23 to District 2 at this point once we get to the  
24 complaints. Now we're talking about equal representation  
25 through the entire city. So some of these things that

1 are here don't represent GRACE particularly but the  
2 entire group of plaintiffs.

3 Q. Okay. Well, I'm here talking to Grace's  
4 corporate representative.

5 A. Right.

6 Q. I appreciate that there are other  
7 plaintiffs that might have other beefs with -- again, my  
8 term, not necessarily anything that you'll read in your  
9 complaint, that's well written, but I'm talking about  
10 GRACE, and I want to know about GRACE.

11 So from Grace's perspective does GRACE  
12 feel -- what changed for GRACE or did nothing change for  
13 GRACE with the 2022 plan or the 2023 plan in terms of  
14 where the West Grove was placed?

15 MS. McNAMARA: Objection to form.

16 BY MR. LEVESQUE:

17 Q. I'll rephrase.

18 What changed for GRACE related to the 2023  
19 plan, once all of your members, the ones that you've  
20 identified that live in District 2, what changed for  
21 those members that were kept in District 2 that they  
22 believe that their commissioner's job is to represent the  
23 predominant group; not them?

24 A. I don't -- I don't know that that refers to  
25 GRACE.

1 Q. Okay. So that's not a statement that GRACE  
2 would necessarily attribute to its members.

3 It's something that GRACE would say, that  
4 might apply to the NAACP organizations, it might apply to  
5 Engage, but that's not referring to us.

6 A. (Witness reading document.)

7 So a little bit of time has lapsed, so one  
8 more time with the question.

9 Q. Sure: If I understand what you're saying,  
10 that is a statement that GRACE would ascribe to the other  
11 plaintiffs; it's not something that GRACE would say  
12 applies to Grace's members?

13 A. Yeah, I don't know.

14 Q. Okay.

15 A. I don't know.

16 Q. And I will tell you, Reverend Robinson, "I  
17 don't know" is a great answer, if it's the truthful  
18 answer.

19 A. Yeah it is. It is. I don't know.

20 MR. MERKEN: Okay. Can we take a  
21 five-minute break?

22 MR. LEVESQUE: Yeah, we're at a good  
23 breaking point.

24 (Recess taken, 3:43 p.m. to 3:51 p.m.)

25

1 BY MR. LEVESQUE:

2 Q. Reverand Robinson, I am going to show you  
3 what we are going to mark as Defendant's Exhibit 8234.

4 (Defense Exhibit 8234 was marked.)

5 BY MR. LEVESQUE:

6 Q. Do you recognize that map?

7 A. Yes.

8 Q. What is that map?

9 A. This is Plaintiffs' Map 1.

10 Q. Okay. Did you have any input into that  
11 map?

12 A. Yes.

13 Q. Did you draw that map?

14 A. No, I didn't draw it.

15 Q. Do you know who did draw it?

16 A. Not personally. I know we have a great  
17 team of attorneys and experts. And so, somebody who does  
18 all that did all that, but I did give input.

19 Q. And if I remember correctly, you stopped  
20 being the Chair of GRACE in January of 2023?

21 A. Yes.

22 Q. Were you still on the board playing any  
23 role in the organization at that time?

24 A. I was still on the board.

25 Q. Did the board vote to approve this map?

1           A.     You know, I don't remember. I don't  
2 remember if we voted to approve this map, but I know we  
3 were all a part of the conversation.

4           Q.     Other than your attorneys, who else was  
5 involved in the conversation?

6           A.     The other plaintiffs.

7           Q.     Would everyone get together, either in one  
8 space or on a Zoom call? How did those conversations  
9 occur?

10          A.     Lots of conversations on Zoom with  
11 everybody.

12          Q.     All right. Is that the way the map was  
13 shared with you?

14          A.     Initially, yes.

15          Q.     Do you recall when this particular map was  
16 shared with GRACE?

17          A.     I don't recall exactly when, but I do know  
18 that it was after the enacted map was made public and  
19 after -- so it was after that, and then it was after --  
20 you know, we started out with a small, you know, civil  
21 rights group, and then after, we were able to retain ACLU  
22 counsel and after several meetings, and then we were able  
23 to come up with this. So it was -- I don't remember the  
24 date, I'm sorry.

25          Q.     Was it before or after a complaint was

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1 filed?

2 A. I don't remember.

3 Q. Do you recall if it was before or after the  
4 First Amended Complaint was filed, which would have been  
5 February 10th, 2023?

6 MS. MCNAMARA: February 10th, 2023 is the  
7 date on the First Amended Complaint.

8 MR. LEVESQUE: Thank you.

9 A. So I don't remember the dates, and I'll --  
10 I'll tell you why, you know. I resigned as the board --  
11 the chair, well, because, you know, the term was up, but  
12 we kind of didn't have an extra year because of COVID,  
13 but I started a doctoral program. So my doctoral program  
14 is in Dayton, Ohio. So I fly back and forth from Miami  
15 to Dayton, Ohio for my doctorate program. And at the  
16 same time, my wife completed her doctorate. And so, it's  
17 just -- and my daughter is 16. So just, it was one of  
18 the reasons I needed to move -- you know, not be the  
19 chair because I had so much going on. So there are tons  
20 of dates in my head, and so I apologize. I don't  
21 actually remember the dates.

22 BY MR. LEVESQUE:

23 Q. Do you know who in GRACE would know the  
24 dates?

25 A. Probably the -- the vice chair was most --

1 most active in all of the meetings so, and -- and she  
2 keeps copious notes, so she would probably have those  
3 dates.

4 Q. And would that be Ms. Donaldson?

5 A. Yes.

6 Q. Is there a reason why you didn't speak to  
7 her about getting ready for this deposition?

8 A. Just busy.

9 Q. Okay. Do you know if the board of GRACE  
10 approved this map?

11 A. I -- I know we were okay with it. I don't  
12 remember a vote. If the vote happened, I don't remember  
13 it. But I know that we were in agreement with this map  
14 along with the other plaintiffs.

15 And can I add something?

16 Q. Sure.

17 A. I would like to add that at this point  
18 when -- at this map, what I do remember is that, we had  
19 been -- I don't know if we had been told or heard or we  
20 believed, but the implication was that there was no other  
21 map possible, right, that could keep neighborhoods  
22 together, that could do all the things that we were --  
23 that we had questions about. And so, this map was  
24 just -- initially it was just to prove that it could be  
25 done differently.

1                   So initially, this map wasn't -- we don't,  
2 you know, create this map with the intent that it would  
3 be the final map. The intent for this map was you, city  
4 commission, said it can't be done, so we've gotten  
5 together with experts and we -- and we're just showing  
6 you it can be done. So let's try to get it done.

7                   Q.     Okay. One of the features of this map  
8 is -- that's different from every other map that the city  
9 commission has adopted is Flagami is united into  
10 one district.

11                  A.     Uh-huh.

12                  Q.     Let me ask this: Does GRACE have any  
13 members that live in the Flagami neighborhood?

14                  A.     I don't know.

15                  Q.     Is GRACE aware of anyone from that area who  
16 requested that Flagami be united into one district?

17                  A.     I'm not aware of any.

18                  Q.     Do you know why GRACE was -- Grace's map  
19 united Flagami into one district, if nobody requested it?

20                  A.     Again, I believe that at this time, we were  
21 just trying to prove to the city commission who implied  
22 that just, you know, uniting neighborhoods and using  
23 natural boundaries and all these other things could not  
24 be done. I think this was just to say, listen, it can be  
25 done, if you try. And so, I think this map attempted to

1 unite neighborhoods, traditional neighborhoods just to  
2 show that, hey, this can be done and still meet the  
3 standard deviation.

4 Q. What is so important about keeping  
5 neighborhoods together?

6 A. What's been important about it?

7 Q. Yeah.

8 A. People share interests, people share  
9 history. And as a part of, you know -- Grace's purpose  
10 is to preserve the culture, the community, the history.  
11 And so -- and so, keeping neighborhoods together is  
12 important because it does that.

13 Q. Okay. What type of history does a tenant  
14 in the West Grove share with an unnamed athlete in the  
15 North Grove?

16 A. I mean, it could be none because they may  
17 not be from -- usually, the athletes are from somewhere  
18 else, so it could be none, it could be a lot, it could be  
19 of Bahamian descent or, you know, that -- so that's tough  
20 to answer directly.

21 Q. But let's say they grew up in Philadelphia  
22 or Cleveland --

23 A. Uh-huh.

24 Q. -- and they're just living there because  
25 they're playing for the Miami Heat or Miami -- the

1 Florida Marlins or the Miami Marlins?

2 A. Miami now, yeah.

3 Q. Okay. They're probably not going to have a  
4 whole lot in common with the person who lives in -- who's  
5 a tenant living in, you know, an apartment, correct?

6 A. That's probably not -- yeah. Well, maybe  
7 not now. Maybe when they were younger, you know,  
8 depending on what circumstances they grew up in.

9 Q. But they wouldn't have a history not being  
10 from the area; that's not going to be something that's  
11 shared?

12 A. Yeah, they wouldn't share that history.  
13 They could have some things in common.

14 Q. When this map was drawn and you united  
15 neighborhoods, was there anything that was relied on to  
16 say, okay, these are the official boundaries for this  
17 neighborhood?

18 A. Yeah, there was. There was tons of  
19 research and data. There was, like, a lot of work that  
20 was done. And so, I mean, it was impressive, you know,  
21 down the street numbers, and I mean, there was a lot --  
22 lot of work that went into what was a neighborhood, what  
23 wasn't, a lot of conversation amongst the members of  
24 GRACE and other plaintiffs to try and figure out what was  
25 what.

1           Q.     Okay.   Would you agree that if you have a  
2 District that's been in place for a long time,  
3 significantly revising that district such that that  
4 community unit is now linked with a community that they  
5 were never linked with before might be confusing to  
6 voters?

7           A. I don't know. There are a lot of variables  
8 to consider. Could it be confusing? Yes, it could be.  
9 Or, you know, there may be situations where people can't  
10 really understand it so. . .

11 O. It all depends kind of on the person?

12 A. Yeah.

13 Q. Okay. In your experience with pastoring a  
14 church -- well, let me ask this: Is your church within  
15 the city limits?

16 A. Yes.

17 Q. And you're experiencing pastoring a church  
18 with a minority community.

22                   A.       Oh, yeah people get confused. I mean, we  
23 live in Miami.

24 Q. So sometimes, any type of change might be  
25 confusing in other situations, even if they do the best

1 to explain it?

2 A. Yeah, it can be confusing.

3 Q. Would you agree that Plaintiffs' Map 1  
4 represents a significant change from the districts that  
5 had been in place for a good number of years?

6 A. I think it does. I mean, it is -- it shows  
7 change. And, again, I say that with this qualification  
8 that this map wasn't drawn to be the map. It was drawn  
9 in response to the implication that a map that kept  
10 neighborhoods together used natural boundaries, you know,  
11 that it couldn't be done. So this was just to say, hey,  
12 commissioner, it can be done, so please go back to the  
13 drawing board and try again. I think that was the intent  
14 of this first map.

15 Q. You would agree that this map doesn't  
16 identify all of the neighborhoods in the City of Miami,  
17 correct?

18 A. Yeah, there are other neighborhoods.

19 Q. For example, West Grove is not on this map?

20 A. Correct.

21 Q. And so, is it fair to say that -- would  
22 you -- strike that.

23 Would you agree that this map does actually  
24 split some neighborhoods because sometimes when you're  
25 equalizing population, you have to split neighborhoods?

1 A. Yes, it does.

2 Q. And sometimes, when you're drawing those  
3 lines and you're making the decision of, do I keep a  
4 neighborhood whole, or do I follow a natural geographic  
5 boundary, there's going to be some tension there?

6 A. There is, yes. And I think -- and again --  
7 and my understanding at that time was that this is to  
8 show the city commission that we aren't unreasonable,  
9 right? That we understand that this isn't easy to do.  
10 We understand that there may be neighborhoods that need  
11 to be split, you know, but let's do it in a way that, you  
12 know, the residents are agreeable or at least as much as  
13 possible because you can't please everybody, but the  
14 intent was not to say, this is what we want to be  
15 implemented. I think the intent of this was to say, hey,  
16 there are other ways to do this. Can you please have the  
17 consultants and experts that -- you know, our tax dollars  
18 are contributing to, can you have them go try again. I  
19 think that was the intent of this.

20 Q. Let me ask this about that: Were you aware  
21 that the city commission established criteria for their  
22 map drawers to follow when they sent them off to draw  
23 maps?

24 A. Yes.

25 Q. Okay. What is your understanding of what

1 that criteria was?

2 A. Ah, man, I don't remember all of them.

3 Q. Okay.

4 A. But I do remember them being, you know, the  
5 main voice at commission meetings, and -- but I don't --  
6 I don't remember all of the criteria.

7 Q. Do you remember compliance with the Voting  
8 Rights Act being one of them?

9 A. Yes, yes.

10 Q. Do you remember them having a discussion or  
11 designating that they wanted substantial equal population  
12 versus the exact population?

13 A. I don't remember that, but that makes sense  
14 to me.

15 Q. Do you remember them saying that they  
16 wanted to keep the core of the existing districts?

17 A. I don't remember that.

18 Q. Are you aware of whether keeping the core  
19 of existing districts is considered a traditional  
20 redistricting criteria?

21 A. I'm not aware of that.

22 Q. Are you aware of whether keeping  
23 neighborhoods whole is a tradition for redistricting  
24 criteria?

25 A. Yes, I understand that it is.

1 Q. And following natural and geographic  
2 boundaries?

3 A. Yes, I understand that, as well.

4 Q. And drawing compact districts?

5 A. I'm not familiar with compact districts.

6 Q. Okay. Did GRACE have any questions or  
7 concerns about the way District 5 was drawing its map?

8 A. I'm sure the members of GRACE had concerns  
9 about this. You know, but, again, this was just -- this  
10 was not, hey, let's go implement this, you know. This  
11 was, see, it can be done, city commission, please, try  
12 again. But so yeah, I think there were concerns  
13 all-around. I don't think -- I don't think at this map  
14 everybody was content like this is what we want. I think  
15 this was to say, there are other ways of doing this.

16 Q. Well, this was one of the maps that was  
17 provided to the commission shortly after the District  
18 Court enjoined the 2022 plan.

19 Would you agree with that?

20 A. Yes.

21 Q. Do you know how long this map had been in  
22 existence before the Court enjoined the 2022 plan?

23 A. I don't know.

24 Q. Do you know if was days, weeks or months?

25 A. I'm so sorry. The dates are the only thing

1       that I would be challenged with today. I don't remember  
2       the date or time.

3           Q.     So if I understood you correctly, if this  
4       was proposed to the city, GRACE would have still wanted  
5       changes, potentially, to this map versus the city just  
6       picking it up and passing it?

7           A.     I think, yes -- I think GRACE was opened to  
8       conversation.

9           Q.     Okay. Well my question was, because you  
10      indicated that there might be some things that GRACE  
11      might have wanted to change: What are the things that  
12      GRACE would have wanted to change about this map?

13           A.     You know, I don't re- -- I don't recall. I  
14      don't know, you know, all of the discussion. You know, I  
15      just remember the point -- I just remember the point, you  
16      know, like the main point was, you know, there is a --  
17      there's another way to do it. So, you know, we just want  
18      to show you that so you can try because we just felt like  
19      the city wasn't even going to try, like this is the map,  
20      this is it. And that's what I think they voted on, on  
21      the enacted map.

22           Q.     And at least as it pertains to Grace's  
23      concerns with the 2022 plan --

24           A.     Uh-huh.

25           Q.     -- this map addressed it because West Grove

1       is back in District 2, correct?

2           A.     Yes, one -- one of those concerns, yeah.

3           Q.     And what were the other concerns that GRACE  
4 had?

5           A.     I think it was the CRA district, the  
6 natural boundaries, keeping neighborhoods together.

7           Q.     Well, this map would have done all of that  
8 correct?

9           A.     I think this map started that, it helped us  
10 out for sure. And then I also -- I also would like to  
11 add that this map was before substantial conversations  
12 with other residents in the city. And, you know, so we  
13 came back later with some other things because, you know,  
14 we started showing this to the city, to the residents of  
15 the City of Miami. And they started saying, hey, well,  
16 what about this and that and that? So we got other  
17 input, you know, as well. So we knew that there was  
18 going to need to be some changes.

19          Q.     So if I understand that then, it sounds  
20 like there was some dissatisfaction, even amongst the  
21 plaintiffs, but everybody was willing to live with it,  
22 but then when you started sharing it broadly, you were  
23 getting more constructive feedback that this doesn't work  
24 for us, this doesn't work for us; is that fair?

25          A.     Yes. We were doing what we wanted the city

1 commission to do; was to talk to the residents and get  
2 input. So we modeled our approach after what we had  
3 hoped and what we were requesting the city commission to  
4 do.

5 Q. What gives you the impression that the city  
6 commission was not listening to its residents?

7 A. Because at the commission meeting, they  
8 called us actors. They made very degrading statements  
9 about us. One commissioner referred to, you can't get  
10 all of the meat, you've got to get some of the bone  
11 referring to what I understood as the Black community or  
12 Black population as the bone rather than the meat. So  
13 those comments from the desk are what led us to believe  
14 that they weren't listening. And then I think, I don't  
15 know the exact number, but it felt like a hundred people  
16 came here one day, and that may not be the number, but  
17 there were quite a few residents and business owners and  
18 others who came in and said it, we don't agree with this.  
19 And the city commission didn't wink. They approved their  
20 map without taking into consideration what the residents  
21 had to say.

22 Q. When you say they didn't take it into  
23 consideration, they didn't follow the request, but it  
24 doesn't necessarily mean they didn't consider it, does  
25 it?

1           A. It doesn't mean that. I know it could have  
2 been considered without my knowledge -- without our  
3 knowledge, yeah.

4           Q. And I'm familiar with the meat and bone  
5 comment.

6           A. Yeah.

7           Q. You took that as referring to the Black  
8 community.

9                         Which part of the meat or the bone would  
10 you identify with the Black community?

11          A. I understood the commissioner to be  
12 referring to the Black community as the bone or the poor  
13 community as the bone. And the, you know, communities  
14 that were either not Black or, you know, not impoverished  
15 as the meat. We can't take all of the meat and not give  
16 some of the bone or something like that.

17          Q. Were you present for that meeting?

18          A. I was. I was there.

19          Q. Were you listening?

20          A. I think -- I think I was listening. Yeah.

21          Q. Do you recall if in the course of that  
22 colloquy leading up to the meat/bone comment, they were  
23 discussing a park?

24          A. I don't remember.

25          Q. Is it possible that that was more in

1 reference to a commissioner wanting to both have a park  
2 in his district and the other commissioner saying, I can  
3 give you the park but you can't just take the park,  
4 you've got to take the neighborhood that the park serves?

5 A. Uh-huh.

6 Q. And what's your understanding of the  
7 surrounding neighborhood -- well, first of all, do you  
8 understand, do you know what park they were talking  
9 about?

10 A. I don't remember. I don't remember. It  
11 was a while ago. I think I probably knew. I was kind of  
12 probably more attentive to it at the time, but I don't  
13 remember now. But I do just remember that comment.

14 Q. And that was a colloquy between  
15 commissioners for District 3 and District 4, correct?

16 A. Just to make -- just for clarity, I believe  
17 de la Portilla and Reyes.

18 Q. Okay.

19 A. De la Portilla and Carollo.

20 Q. And Carollo was the one who made the  
21 comment?

22 A. Yeah.

23 Q. But I had it in my head that it was Reyes,  
24 but Diaz de la Portilla?

25 A. Diaz de la Portilla, yes.

1 Q. It works just as well.

2 That didn't involve anything in District 2,  
3 as well, did it?

4 A. It didn't.

5 Q. Okay. And that wasn't your issue in terms  
6 of Grace's members; Grace's issue was primarily what was  
7 happening to West Grove and making sure that West Grove  
8 stayed in District 2?

9 A. I think by that time, it had evolved,  
10 right? I think by that time, you know, initially, it was  
11 just District 2, but by the time we got to, you know,  
12 maps and things, at that point we realized that there  
13 were other residents and other people from other parts of  
14 the city who shared our concerns. So now we are, as  
15 GRACE, yes, we are concerned about our community, but  
16 we're now a collective, a group of people, and we're  
17 concerned about everybody's concerns --

18 Q. Okay.

19 A. -- within the city, so. . .

20 Q. So then if I understand correctly there,  
21 even though Grace is referring to the 2023 plan, even  
22 though Grace's concerns with what was going on with the  
23 West Grove might have been addressed, GRACE shared the  
24 concerns that members of other organizations and  
25 individuals and other organizations and other districts

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1 had?

2 A. Correct.

3 Q. Okay.

4 A. Correct.

5 MR. LEVESQUE: I'm going to mark this as  
6 Defendant's Exhibit 8235.

7 (Defense Exhibit 8235 was marked.)

8 BY MR. LEVESQUE:

9 Q. Reverand Robinson, do you recognize this  
10 map?

11 A. Yes.

12 Q. And what is this map?

13 A. This is Plaintiffs' Map 2.

14 Q. And in this map, was this intended to  
15 communicate to the city that hey, there's a different way  
16 to draw it, or was this a map that GRACE was hoping the  
17 city would actually pass?

18 A. Both of these maps are -- from my  
19 recollection, were submitted to the city at the same  
20 time. So I think, again, we were proving the point that,  
21 you know, this can be done differently. Of course, we  
22 presented maps that we would be okay with, you know, if  
23 the city took what -- but I think the intent at that  
24 point was listen, there's another way that this can be  
25 done. So both of these maps were -- we discussed both of

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1 these options at the same time and agreed to submit both  
2 of them, along with the other plaintiffs simultaneously.

3 Q. Now, what about this map is notable  
4 compared to P1?

5 A. Well, we'll start with District 2. It goes  
6 up a little further north, up to Edgewater.

7 Q. And let me stop you there.

8 A. Okay.

9 Q. It splits the Community of Edgewater, does  
10 it not?

11 A. It does.

12 Q. Okay. Is there a reason why that community  
13 was split?

14 A. No particular reason, I think, other than  
15 to try to meet, you know, the standards of deviation and  
16 to follow all of the redistricting requirements. I think  
17 that was the only reason, but later we had conversations  
18 with, I think, the Biscayne Neighborhood Association, and  
19 they rep- -- they represented the population Edgewater,  
20 so they told us -- they talked to us about what they  
21 would like to see there. And in a subsequent map, we  
22 included what they -- they recommended, so. . .

23 Q. Okay. Is there a reason why Little Havana  
24 was split in this map?

25 A. I -- again, I don't think any particular

1 reason, other than, you know, to try to meet the  
2 requirements of redistricting. And, again, our -- our  
3 goal here was to say, we'd like you to do the work that  
4 we did and try to -- you know, try to do something. It  
5 can be done differently and still meet all the  
6 requirements. So -- so no -- no particular reason other  
7 than to try it to meet the requirements.

8 Q. And in this map, the West Grove is kept  
9 with the rest of Coconut Grove, correct?

10 A. Yes.

11 Q. And in this map, you still include Flagami  
12 into one district, correct?

13 A. Correct.

14 Q. Even though nobody from Flagami has ever  
15 asked for that?

16 A. Correct.

17 Q. Is there a reason why you would do  
18 something so dramatic for a community that never  
19 requested it?

20 A. No. Again, I think at that point we had  
21 never -- we hadn't, you know, had any conversation with  
22 anybody from Flagami. And so, just in an attempt to meet  
23 the requirements we just, you know, try and keep  
24 neighborhoods together. You know, that's all. And,  
25 again, the intent wasn't to say, Flagami, you got to be

1       in one district. That wasn't, you know, to tell them  
2       what to do. It was to show the city that there were  
3       other options and to ask them to go back and try.

4           Q.     Are you aware that in every single map that  
5       the plaintiffs had presented Flagami is kept whole?

6           A.     I believe so, yeah.

7           Q.     And no idea why that is?

8           A.     No intention at all. You know, I don't  
9       think we sat down and said, hey, let's -- you know, let's  
10      do something that Flagami wants or doesn't want. I think  
11      we're just trying to meet the criteria.

12          Q.     When you shopped these maps in the  
13      community, which communities did you go to?

14          A.     We didn't -- so we did at one point. We  
15      went to Overtown. We had a meeting in Overtown at a  
16      theatre or somewhere in Overtown. I can't remember  
17      exactly where. The Biscayne Neighborhood Association,  
18      that was a Zoom meeting, so we didn't go to them. And  
19      then we had open community meeting at Greater St. Paul,  
20      and quite a few people from other districts and other  
21      neighborhoods showed up at that meeting to voice their  
22      concerns and opinions.

23          Q.     Were there any other community meetings  
24      that you had to get input?

25          A.     There were other communities in Coconut

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1 Grove, but not that GRACE hosted. GRACE was the host of  
2 the meeting at Greater St. Paul, but there were other  
3 community meetings that GRACE attended.

4 Q. Okay. What were some of those other  
5 meetings?

6 A. HOTA, the Homeowner and Tenant's  
7 Association held a community meeting where they got  
8 feedback and input. The Coconut Grove Ministerial  
9 Alliance, which is a member of GRACE, had a community  
10 meeting where there were extensive conversations back and  
11 forth about -- about the maps, the proposed maps. Those  
12 are two that I know I'm aware.

13 Q. And one of your board members, Clarice  
14 Cooper, is a member of HOTA, correct?

15 A. I believe she's the President of HOTA.

16 Q. And the Coconut Grove Ministerial Alliance,  
17 is that an organization of churches, or is it an  
18 organization of pastors and churches or both?

19 A. Coconut Grove Ministerial Alliance, the  
20 churches are the members, and the pastors are the  
21 board -- make up the board.

22 Q. You've mentioned a communication with  
23 Overtown for a community meeting in Overtown.

24 A. Uh-huh.

25 Q. What prompted that meeting?

1           A.     Oh, there were some folks in Overtown  
2 who had some concerns. Now, I think one -- one of the  
3 other plaintiffs, the NAACP, you know, brought to one of  
4 our collective meetings as plaintiffs that folks in  
5 Overtown wanted to have some input, so we scheduled a  
6 meeting with them.

7           Q.     And that's because in Map 1, Overtown was  
8 completely cut out of District 5; is that correct?

9           A.     I don't know if that was the reason. I  
10 know what -- what was --- what I remember was that O- --  
11 the people in Overtown have some concerns, and they would  
12 like to meet with us.

13          Q.     Tell me what you know about Overtown.

14          A.     Oh, man. There -- so I know Bethel --  
15 Greater Bethel Miami Church is in. Overtown, I know that  
16 Overtown is a changing community. I know that Over- --  
17 Wyn-- -- Wynwood used to be Overtown. It's historic.  
18 You know, old Black neigh- -- neighborhood. A lot of  
19 African American history there.

20          Q.     In fact, that's one of Miami's older Black  
21 neighborhoods, correct?

22          A.     Of course.

23          Q.     And for the Black residents of Overtown,  
24 being carved out of the only Black district was probably  
25 not acceptable to them.

1 Would you agree?

2                   A. Well, it wasn't acceptable in -- in the  
3 enacted map. There -- there are portions of Ov- --  
4 Overtown -- in fact, I think there's a church that sat  
5 right on a street, and they got carved out, so a church  
6 that was traditionally in Overtown and served the  
7 Overtown community, so Overtown, the city's map, you  
8 know, cut Overtown, as well.

9 Q. Are you referring to the 2022 plan or the  
10 2023 plan?

11                   A.       The plan that we were responding to, so I'm  
12                   not sure which one that is, but the one that these maps  
13                   were in response to.

14 Q. Well, at this point in time, from a  
15 timeline, the city hadn't enacted a plan yet.

A. Okay. So it was in -- what's that word?

17 Q. And let me kind of put a finer point on  
18 that.

19 The District Court had enjoined the 2022  
20 plan.

21 A. There you go.

Q. The 2023 plan was not enacted yet.

23 A. Okay.

Q. So were these efforts to address those Overtown concerns from the 2022 plan?

1           A.     It was all of their concerns because we --  
2     we had not -- I think they were represented by the NAACP.  
3     And the NAACP said, hey, we need to go and have a meeting  
4     and talk to them. And so, we went over to hear. So they  
5     had concerns about the -- at that time the enjoined map  
6     and what we had proposed to the city as, you know, other  
7     options. So they just had concerns that they wanted to  
8     share. And I think we -- after we spoke with them, I  
9     think we addressed their concerns in our -- in the  
10    subsequent map after having those conversations.

11           Q.     Okay. Let's go ahead and look at that map.

12                   I'm going to show what you we're going to  
13    mark as Defendant's Exhibit 8236.

14                   (Defense Exhibit 8236 was marked.)

15    BY MR. LEVESQUE:

16           Q.     Reverand Robinson, do you recognize that  
17    exhibit?

18           A.     Yes, I recognize it.

19           Q.     And what is that exhibit?

20           A.     This is Plaintiffs' Map 3.

21           Q.     Okay. And in terms of keeping Overtown  
22    whole, does this keep Overtown whole?

23           A.     I believe it does. I believe that's what  
24    we were trying to do here.

25           Q.     Okay. And even there --

1           A.     But I think they made a concession there  
2 because I remember that meeting, we talked about this  
3 east/west little portion that I think was left out to the  
4 west there. And I think they, in that meeting, those  
5 residents said that they didn't really consider that to  
6 be Overtown.

7           Q.     Are you aware if they considered areas  
8 south of there still part of Overtown?

9           A.     I believe -- I believe they did.

10           No. The part that's down into downtown?

11           Q.     Yes.

12           A.     I don't -- I don't think so. I think they  
13 were very clear on what they understood to be traditional  
14 Overtown or historical Overtown. I think even in that  
15 meeting they said that we couldn't even go over there  
16 when we were kids, you know. Somebody like an older  
17 gentleman said, yeah, we -- they put that in Overtown,  
18 but we couldn't even go over there when we were kids, so  
19 they didn't -- you know, they really were vocal about  
20 what they considered to be historical Overtown.

21           Q.     Are you aware that Commissioner King wanted  
22 certain areas of downtown because she wanted an economic  
23 engine for her district?

24           A.     Yeah, I am aware of that. Yes, sir.

25           Q.     Okay. You would agree that wanting an

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1 economic engine for your district has nothing to do with  
2 race, correct?

3 A. Yeah, I don't think so.

4 Q. Okay. Do you think there was anything  
5 improper about her wanting those areas in her district?

6 A. I -- I don't know of anything improper, if  
7 there is. I do know -- I do believe there are other  
8 economic engines in that district though. For example,  
9 the Omni.

10 Q. Do you know if the Omni is entirely in her  
11 district or if it's shared with District 2?

12 A. I think it's shared with District 2. And  
13 I'm not sure about this, but I know that -- I do believe  
14 the Omni CRA and I believe there's another CRA in  
15 District 5, as well, that has been -- I mean, we know  
16 that there are other economic engines there.

17 Q. Is West Grove one of the older, if not the  
18 oldest, Black community in Miami?

19 A. We believe it is. You know, some people  
20 say other parts, but, you know, we believe -- we believe  
21 it is.

22 Q. What about Little Havana for the Hispanic  
23 Cubans?

24 A. Is it the oldest part, one of the oldest  
25 parts of Miami?

1 Q. Yeah.

2 A. Not to my knowledge.

3 Q. Do you know what one of the older Hispanic  
4 communities for Miami would be?

5 A. I don't.

6 Q. And this was the plaintiffs' third effort  
7 to draw a map.

8 And were there still constituencies that  
9 you were working with that were not happy with this map?

10 A. That we were working with, I don't think  
11 that we had anybody who was just unhappy. At this point,  
12 we all understood that, you know, some concessions would  
13 have to be made. I think the folks that we were working  
14 with were happy to have input, you know, to have -- if we  
15 were going to have something new or different, at least  
16 to allow us to have some say so in what it looks like.  
17 And so, I don't remember after this point any of the  
18 folks we were working with being unhappy.

19 Q. Did you work with any of the commissioners  
20 on coming up with either Plaintiffs' Map 1, 2 or 3?

21 A. So we tried to for Map 3 in -- because we  
22 had mediation, court -- court ordered mediation, which I  
23 understood to be an opportunity for us to try to work  
24 together. However, I was very disappointed in that  
25 mediation process because I didn't feel as though the

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1 city really made an attempt to work with us. And -- and  
2 we -- during those mediations we provided what we had to  
3 them, to the city. I think you might have been there.

4 Q. Uh-huh.

5 A. And we left that meeting understanding or  
6 believing that the city had nothing, and then the next  
7 day, the city has, like, all these maps. So we -- we  
8 didn't feel that the city, you know, did -- gave a best  
9 effort to really try to work with us on trying -- putting  
10 something together that we all could be agreeable to.

11 Q. Do you know if things like the way the  
12 plaintiffs have universally treated Flagami were  
13 agreeable or nonstarters for the city?

14 A. I don't know if they were nonstarters. I  
15 think I learned the next day in the commission meeting or  
16 in the special-called meeting that there was some concern  
17 about that. But it would have been great to know that  
18 prior that day because I think it's apparent that  
19 everybody we talked to we gave, you know, serious  
20 consideration to their concerns.

21 Q. Well, once you were aware of their  
22 concerns, plaintiffs didn't do anything with their plan  
23 forward to try to address those concerns, did they?

24 A. I don't think so. I don't know if we had  
25 time. I think they -- I think the commission held that

1 meeting I think, like, on the last day something had to  
2 be presented to the Judge, to the Court. So I'm not sure  
3 if there was time. I think -- I think we may have tried  
4 to rush and do something really quickly, but it wasn't --  
5 didn't really have enough time do a good job.

6 Q. Okay. Let me represent to you that the  
7 commission meeting where they adopted the map was  
8 June 14th.

9 A. Okay.

10 Q. I'll also represent to you that the city  
11 was obligated to inform the Court what it was going to do  
12 in terms of adopting a map by June 30th.

13 A. Yep.

14 Q. Plaintiffs' Map Plan 4 first saw the light  
15 of day sometime in July.

16 A. Uh-huh.

17 Q. So if GRACE was made aware at that  
18 June 14th meeting that the configuration of Flagami was a  
19 nonstarter, and why it was a nonstarter, they had three  
20 weeks, two to three weeks to do something different, do  
21 you know if there was any effort made to draw something  
22 differently than what is reflected in Plan 4?

23 A. I don't know, and I don't believe so. I  
24 don't -- I'm not sure if at that point GRACE was  
25 confident in what the commission represented for their

1 individual constituents because in our conversations with  
2 other groups, what the citizens represented was not  
3 consistent with what the commission represented. And  
4 so -- so I'm -- I'm not sure if that was taken into  
5 consideration at that point; I'm not sure. But, again,  
6 like I say, I have to look at Map 4 to remember but I do  
7 remember Map 1, 2 and 3 for sure in those processes.

8 Q. Let me ask this: What community meetings  
9 did you hold in Flagami to get their feedback on whether  
10 they wanted to be split or kept whole?

11 A. We didn't hold any in Flagami.

12 Q. What community meetings did you hold in  
13 Little Havana to discuss whether Little Havana should be  
14 split or kept whole?

15 A. We didn't hold any.

16 Q. What about Allapattah.

17 MR. LEVESQUE: A-L-L-A-P-A-T-T-A-H.

18 A. We didn't hold any in Allapattah.

19 BY MR. LEVESQUE:

20 Q. What about Shenandoah?

21 A. We didn't hold any meetings in Shenandoah.

22 Q. Did you hold any meetings either of the  
23 three Hispanic districts?

24 A. No, I don't -- I don't remember us holding  
25 any meetings in those districts.

1 Q. Is there a reason for that?

2 A. I don't ever remember those districts being  
3 represented at the commission meetings or saying that  
4 they had any issues, but that -- I don't think that  
5 was -- I don't know if that was our reason, but I do know  
6 that, you know, the districts that had the major concerns  
7 were 2 and 5.

8 Q. Could that be because they were generally  
9 happy with the way their districts were drawn previously?

10 A. Could be.

11 Q. You mentioned problems with District 5.

12 Do you know if the commissioner from  
13 District 5 was happy with her district?

14 A. With which map?

15 Q. We'll start with the 2022 plan.

16 Do you know if she was happy with her  
17 district in the 2022 plan?

18 A. I don't know.

19 Q. Are you aware of whether she voted for it  
20 or not?

21 A. Yes, I believe she did.

22 Q. That would probably be an indicator that  
23 she's willing to live with that district?

24 A. Yeah. I mean, and so, willing to live with  
25 something doesn't necessarily mean you're happy with it.

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1 Q. It also doesn't mean it's unconstitutional  
2 either, correct?

3 A. Correct.

4 Q. Because as you indicated, even as your maps  
5 progress, there are people who are making concessions,  
6 giving up things that they want, getting things that, you  
7 know, other people don't want to give them.

8 Everybody is sort of giving and taking a  
9 little, correct?

10 A. Correct.

11 Q. That's all part of the process?

12 A. That's a part of the process.

13 Q. Reverand Robinson, I am going to show you  
14 what we're going to mark as Defendant's Exhibit 8237?

15 (Defense Exhibit 8237 was marked.)

16 THE WITNESS: All right. Thank you.

17 Oh, yeah, okay.

18 BY MR. LEVESQUE:

19 Q. Reverand Robinson, do you recognize that?

20 A. Yes, this is Map -- Plaintiffs' Map 4.

21 Q. Did the GRACE Board approve this map?

22 A. I think the GRACE Board -- oh, so it wasn't  
23 just our GRACE Board meeting, but at the GRACE Board in  
24 concert with the other plaintiffs agreed to -- to --  
25 agreed to this map.

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1 Q. And it looks like in this map, GRACE is  
2 making -- or GRACE and your other partners are trying to  
3 keep Overtown whole?

4 A. Yeah. So I think, again, just more  
5 response to the community.

6 Q. Was that also in response to Commissioner  
7 King?

8 A. I believe it may have been.

9 Q. Do you recall when she saw your first three  
10 maps, that she was very upset with the way you had  
11 proposed the district?

12 A. I -- I do remember that.

13 Q. And in this map, the West Grove is still in  
14 Coconut Grove?

15 A. Yes.

16 Q. And in terms of the 2023 plan that the  
17 commission enacted, the West Grove is also in District 2,  
18 correct?

19 A. It's hard for me to -- I can't -- I  
20 don't -- I can't see it, you know. I think it would be  
21 helpful if I can look at it.

22 Q. Okay. Did GRACE have any concerns about  
23 the Black voting age population in either Maps 1  
24 through 4 in District 5?

25 A. Yes, because it's a requirement for

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1 redistricting.

2 Q. Okay. And what is your understanding of  
3 the requirement for drawing a district that would be  
4 compliant with the Voting Rights Act?

5 A. That at least one district has to have the  
6 opportunity to elect a Black or Black representation.

7 Q. And is it your understanding that all four  
8 of plaintiffs' maps are compliant?

9 A. Yes, it's my understanding that they are.

10 Q. Reverand Robinson, I'm going to show you  
11 Defendant's Exhibit 8224.

12 (Defense Exhibit 8224 was marked.)

13 THE WITNESS: Thank you.

14 BY MR. LEVESQUE:

15 Q. Do you recognize that map?

16 A. Yes.

17 Q. And what is that map?

18 A. I believe this is the enacted map.

19 Q. And in this plan, is it fair to say that  
20 the West Grove is kept in Coconut -- in District 2?

21 A. Yes.

22 Q. And so, from core of Grace's concerns that  
23 relates to GRACE specifically, this map addressed those  
24 concerns?

25 A. So no -- it would be hard to say that

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1 because when we filed the complaint, our concerns became  
2 the concerns of our co-complaints.

3 Q. And I want to be careful. I understand  
4 that their concerns became your concerns. Right now I'll  
5 talk about what was specific to GRACE and then what was  
6 shared with everybody else.

7 A. Uh-huh.

8 Q. So Grace's core concern, if I remember the  
9 comments to the commission, were keeping the West Grove  
10 in District 2.

11 A. Those are Grace's initial concerns.

12 Q. Okay. And then now with this map, that  
13 concern was addressed but GRACE had --

14 A. Evolved.

15 Q. -- evolved.

16 They shared concerns of the way other  
17 organizations and other individuals were being treated?

18 A. (Nods head.)

19 Q. But, again, their core concerns were  
20 addressed; they just shared the concerns of others.

21 Is that a fair characterization?

22 A. Grace's initial concerns were addressed.

23 Q. Now, in this map you see where Flagami is  
24 split between District 1 and District 4.

25 A. Uh-huh.

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1 Q. Are you aware if it has been like that  
2 since 1997 when the districts were first drawn?

3 A. I'm not sure how long it's been like that,  
4 but I believe this is the way it was prior to the 2022.

5 Q. Is there anything about that configuration  
6 that you think is improper?

7 A. No.

8 MR. LEVESQUE: Let's take a five-minute  
9 break, and I think I might be able to wrap up  
10 soon.

11 THE WITNESS: Okay.

12 (Recess taken, 4:48 p.m. to 4:53 p.m.)

13 MR. LEVESQUE: Back on the record.

14 BY MR. LEVESQUE:

15 Q. Reverand Robinson, your bylaws does GRACE  
16 have a records custodian?

17 A. A records custodian?

18 Q. Yes, somebody who keeps the minutes, the  
19 bylaws, the official records?

20 A. Our secretary does that.

21 Q. Okay. Is that Clarice Cooper?

22 A. No, that's Christopher Hudson.

23 Q. Christopher Hudson.

24 Do you know if Mr. Hudson keeps those  
25 personally, or does GRACE have an office or headquarters

1 where those records are kept?

2 A. I think everything is kept electronically,  
3 I believe. So I believe Christopher Hudson should be  
4 able to access them.

5 Q. Okay. Are those documents on, like, a  
6 network somewhere or are they on his personal laptop  
7 or --

8 A. I'm not sure exactly where they're kept.

9 Q. Okay. Do you know if GRACE has, like, an  
10 email server or a computer that gets, like, passed from  
11 board member to board member?

12 A. We don't.

13 Q. Okay. Are you aware of anything that might  
14 have happened in those records that would make them  
15 otherwise unavailable at this time?

16 A. I'm not aware of anything.

17 Q. Have you looked at or studied the  
18 demographic data for any of the plans?

19 A. I think some of that information was a part  
20 of our conversations, but have I studied them? I  
21 wouldn't say I've studied.

22 Q. Were you aware that each of plaintiffs'  
23 plans produces a map that would likely elect three  
24 Hispanic candidates, likely elect a Black candidate and  
25 then likely elect a candidate from a plurality district?

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1 A. I wasn't aware of that.

2 Q. Would it surprise you if that was the case?

3 A. Oh, I don't know. I wouldn't be surprised.

4 Q. Okay. That's certainly something that

5 would be foreseeable in a city like Miami with a  
6 majority/minority population between its Hispanic  
7 residents and its African American/Black residents and  
8 everybody else who's left over, correct?

9 MS. MCNAMARA: Objection to form.

10 BY MR. LEVESQUE:

11 Q. I didn't mean anything pejorative by  
12 anybody who was left over, but if you understood what I  
13 was asking, you can answer.

14 A. Yes. I understand.

15 Q. Talking about the map as a whole, do you  
16 believe the city commission sorted the voters into  
17 Hispanic, Black and Anglo districts?

18 A. Yes.

19 Q. Okay. What is your basis for that belief?

20 A. They said it.

21 Q. If organizations and individuals like the  
22 plaintiffs have submitted plans that also perform the  
23 same way for electoral purposes, would it be fair to say  
24 that they also meant to draw districts that would likely  
25 elect three Hispanic candidates, likely elect a Black

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1 candidate and likely perform in a way that plurality  
2 districts perform?

3 A. Who is "they"?

4 Q. The plaintiffs.

5 A. Okay. So can you restate the question?

6 Q. Sure.

7 We just talked about the plaintiffs, each  
8 of the plaintiffs' plans. It wouldn't surprise you if  
9 they performed, essentially, the same way as the city map  
10 does.

11 Does that mean that the plaintiffs also  
12 sorted people into districts based upon their race?

13 A. No.

14 Q. And why not?

15 A. Well, throughout this process, we never  
16 con- -- we didn't consider race. When the plaintiffs  
17 were drawing maps, there was a list of requirements, and  
18 it was those requirements that were -- were looked at;  
19 you know, keeping neighborhoods together, using those --  
20 those are the two that I'm really familiar with. And I  
21 know there were other requirements. I know there was a  
22 standard percentage of deviation, there's all of these  
23 different things that have to, you know -- have to be  
24 covered, which our -- our attorneys and our experts, you  
25 know, they did all of that. So -- so if I -- you know, I

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1 think if by chance they were performed the same way, it  
2 doesn't mean the same things were taken into  
3 consideration.

4 Q. Okay. Were any of your meetings recorded?

5 A. The meetings with -- that met with the  
6 group of plaintiffs?

7 Q. Yes.

8 A. I don't remember them being recorded.

9 Q. Were any of your meetings in the community  
10 recorded?

11 A. Yes, actually. The meeting at Great- -- at  
12 Greater St. Paul was recorded by WLRN, and they took  
13 photos, but I do -- I do remember about halfway through  
14 the meeting, either they left or they were asked not to  
15 record, but he did share that he recorded some of the  
16 meetings.

17 Q. Who asked them not to record?

18 A. I don't remember. I don't remember who --  
19 who asked, but it was whoever -- I don't remember who  
20 asked.

21 Q. Do you know why they were asked not to  
22 record?

23 A. I don't think we -- because we were in the  
24 middle of a litigation I think or, you know, we don't  
25 want to -- you know, I don't think that we wanted that to

1       be on the news or something like that; I don't know.

2           Q.     Okay. But that meeting wasn't just the  
3       plaintiffs, was it?

4           A.     No, it wasn't.

5           Q.     Were your attorneys at that meeting?

6           A.     No, I don't remember any of our attorneys  
7       being -- oh, yes, yes, there were attorneys at that  
8       meeting.

9           Q.     You've mentioned that you didn't consider  
10      race or didn't discuss race, but you never held any  
11      meetings in any of the Hispanic districts, if I  
12      understood correctly; is that right?

13           A.     That's correct.

14           Q.     Okay. Well, is there a reason why you  
15      didn't give anyone from the Hispanics the -- those  
16      districts that represented those districts have a seat at  
17      the table?

18           A.     Well, it's because GRACE didn't consider  
19      districts -- we didn't characterize districts by  
20      nationality, so we -- we didn't believe there were  
21      Hispanic districts, we didn't believe that there were  
22      city commissioned districts. And so, GRACE had many  
23      conversations with Latinos or Hispanic or people of  
24      Hispanic/Latino descent. You know, we talked to many --  
25      the Biscayne Neighborhood Association was full of -- I

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1 think everybody in the meeting was of -- was Hispanic.  
2 So we had many conversations with Hispanics, but we  
3 didn't have con- -- I don't remember us having meetings  
4 -- or we didn't have meetings in Commission Districts 4  
5 or 1 or 3. We didn't host meetings there, not because  
6 they were Hispanic districts but because, you know, I  
7 just don't think we ever had anyone from those districts  
8 express concerns to us. The B & A expressed concern, so  
9 we met with them. Overtown expressed concerns, so we met  
10 with them. No one from the other districts called us and  
11 said, hey, we want to add something to this. And so, I  
12 don't think we met with them because of that.

13 Q. Did you publicize those meetings in those  
14 districts?

15 A. Yes. I mean -- no, did we publicize them  
16 in those districts? I don't think we publicized in any  
17 district. I think we did use -- I think we used -- did  
18 we use social media? I think we used social media. I  
19 believe we used social media to publicize.

20 Q. Other than the statements that you  
21 referenced, is there anything else that you base your  
22 opinion on, that the commission sought to sort Hispanic  
23 Blacks and Anglo voters into districts?

24 A. Other than?

25 Q. Other than the statements that they made in

1 the 2022 commission meetings.

2 A. So, again, give me a little room to answer  
3 this. When she -- you know, when -- when they said  
4 that's what they were doing, then for me, that set the  
5 grounds for their actions to be considered, that that was  
6 what they were doing. So the actions that followed those  
7 statements to me or to GRACE became their effort to do  
8 what they said. So every time we saw what they were  
9 doing, it was attached to their -- their statements. So  
10 all of the actions that sought to bring their statements  
11 into fruition, thereafter, for me, were considered their  
12 efforts to have three Hispanic districts and whatever  
13 else they said.

14 Q. Well, I guess, what about their efforts  
15 then enhanced or complimented whatever they said? What  
16 is it specifically about the efforts that supported your  
17 conclusion that what they said was what they were  
18 actually doing?

19 A. I'm not sure how -- how to answer that.

20 Q. Well, would you agree that if the criticism  
21 of the city commission is that they passed a map that  
22 elected three Hispanics but it is likely to elect three  
23 Hispanics or likely to elect a Black candidate, likely to  
24 elect an Anglo or Hispanic candidate based upon the  
25 population in that plurality district, if you look at the

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1 plaintiffs' maps, they do the same thing, would you agree  
2 then that that might undermine some of those suspicions,  
3 that that might be the only way to draw up the city so  
4 that it elects those candidates with that racial  
5 representation?

6 A. No, I don't agree that it's the same thing.

7 Q. Why is it not the same thing?

8 A. Well, I think -- I think intent is, you  
9 know -- you know, it's the statements. You know, it's --  
10 the intent was to use race to draw the maps. Grace's  
11 intent, along with the other plaintiffs, was to draw the  
12 maps in a way that met the criteria for redistricting.

13 My understanding is that the city, you  
14 know, wanted to use the criteria for redistricting to  
15 implement a map that allowed them to racially  
16 gerrymander. This is what our goal is. This is -- I  
17 think one commissioner said, I have a duty to protect.  
18 That's what they wanted to do. So the map, the  
19 differences in the maps reflect that intent, right? And  
20 in my opinion, or from Grace's perspective. And so, the  
21 maps come out different because the intent is different.  
22 And so --

23 Q. What is different about the maps?

24 A. The neighborhoods that are kept together,  
25 the input of the -- the input of the residents on how

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1 they would like their communities to look, for the  
2 natural boundaries, a couple of other things.

3 Q. Well, would it be fair to say then, though,  
4 that the maps that you present keep more neighborhoods  
5 whole and respect more of the feedback that you got for  
6 Districts 2 and 5?

7 A. Yes.

8 Q. But not necessarily 1, 3 and 4?

9 A. I think it does for 1, 3 and 4.

10 Q. Well, so far I've asked you a couple of  
11 times, you're not aware of anybody saying, hey, let's  
12 unite Flagami, correct?

13 A. No, I'm not.

14 Q. So that doesn't reflect feedback?

15 A. But I'm not aware of anybody saying, let's  
16 not unite Flagami.

17 Q. Right, but that was a common feature in all  
18 your plans, that you don't know why that was done, but  
19 that was a big change from the existing maps.

20 Wouldn't you agree?

21 A. I would agree that I do know why it was  
22 done, and I think I said earlier it was done to meet the  
23 redistricting criteria, which is to keep neighborhoods  
24 together.

25 Q. Do you realize in that district that

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1 creates a 95 percent or more Hispanic district?

2 A. Was it not that before?

3 Q. No.

4 A. Okay.

5 Q. There was no district in the city plan that  
6 has a Hispanic district that high.

7 A. Okay.

8 Q. Are you aware that the city is accusing the  
9 plaintiffs of packing Hispanics in that district because  
10 of the way they drew that?

11 A. Yes.

12 Q. And if nobody requested that change, do you  
13 think that would be a fair criticism?

14 A. I don't think it's a fair criticism because  
15 nobody requested the change. I think it's a fair  
16 criticism because the data shows that those are the  
17 numbers.

18 Q. Okay.

19 A. Because nobody really requested any of the  
20 changes anywhere. It's just something that has to be  
21 done during the redistricting process.

22 Q. And in that regard, most of the feedback  
23 is, don't change us.

24 A. Would you agree with that?

25 A. Yeah, that's the best -- pretty much, yes.

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1           Q.     For example, West Grove, they didn't want  
2 anything to change. They would've loved to have  
3 District 2 just stay the same, but it couldn't.

4           A.     Well, GRACE understood that that District 2  
5 had to change because District 2 had overwhelming growth  
6 in population over the last ten years. So District 2 and  
7 GRACE -- and District 2 understood that District 2 needed  
8 to change. And in order to facilitate that change, it  
9 had to work in concert with the other districts. And so,  
10 I think one of the criteria was keeping neighborhoods  
11 together. So as it relates to Flagami, keeping  
12 neighborhoods together as a requirement was probably what  
13 prompted, you know, us to draw the maps that way.

14           Q.     Okay. But they kept Flagami whole, but  
15 they didn't keep Little Havana whole?

16           A.     Right.

17           Q.     Because you've got to make choices?

18           A.     And we didn't make Edgewater whole because  
19 we had to make choices. So it wasn't like we were  
20 picking on Little Havana. It was, you know --

21           Q.     But you kept Edgewater whole in Map 4  
22 though?

23           A.     Is there not an east/west split in  
24 Little -- in Edgewater Map 4?

25           Q.     My understanding is, it would be --

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1 Edgewater's primarily east of that border, but I could be  
2 wrong.

3 A. Oh, yeah, it looks like it is. Hmm.

4 Q. Well, if the data shows that, generally  
5 speaking, District 5 has a pretty similar ethnic and  
6 racial makeup, District 2 has a pretty similar ethnic and  
7 racial makeup as the 2023 plan, just taking those two  
8 districts, would you say that if you're comparing the  
9 plaintiff's Plan 4 and the 2023 plan and those numbers  
10 are pretty similar, then that might be an indicator that  
11 those districts weren't drawn with racial intent?

12 A. No.

13 Q. Even though that's not what the numbers  
14 say?

15 A. No.

16 Q. Why not?

17 A. Because, and I want to keep -- you know,  
18 because the commissioner said that wasn't their intent.

19 Q. Did they say that wasn't their intent in  
20 2022 when they were passing the 2022 plan, or did they  
21 say that wasn't their intent when they were passing the  
22 2023 plan?

23 A. They -- they said it, and I don't -- I  
24 don't -- I don't believe they evolved.

25 Q. Okay. So they said it in 2022, and you

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1 don't think they evolved to 2023?

2 A. I don't believe so.

3 Q. Okay.

4 A. And I don't think -- representing GRACE, I  
5 don't think GRACE believes so.

6 Q. Okay. But they went in to fix Grace's  
7 initial issue, didn't they?

8 A. They did.

9 Q. Okay.

10 MR. LEVESQUE: No further questions.

11 CROSS-EXAMINATION

12 BY MS. MCNAMARA:

13 Q. I have a couple of questions for you.

14 A. Okay.

15 Q. Reverand Robinson, do you remember you were  
16 asked earlier about the time you spent preparing for  
17 today's deposition?

18 A. Yes.

19 Q. And did you testify that the only meeting  
20 you had to prepare was yesterday?

21 A. I did testify to that, yes.

22 Q. Do you remember if there were any other  
23 meetings besides yesterday's meeting?

24 A. There was another meeting.

25 Q. When?

1           A.     And I believe that meeting took place on  
2 last Thursday, and I was -- I was traveling, so I was on  
3 my phone -- Zoom on my phone, so that may be why I missed  
4 that.

5           Q.     And at that meeting, there was discussion  
6 to prepare for representing GRACE as the corporate  
7 representative in today's deposition?

8           A.     Yes, there -- yes, there was conversation.

9           Q.     Do you have any -- let's focus on the  
10 parishioners of your church, Greater St. Paul AME.

11                  Do you have any parishioners that would  
12 classify themselves as both Black and Hispanic?

13           A.     Yes.

14           Q.     What type of parishioners? Is there a  
15 specific group that identifies that way?

16           A.     Yes. So we have a family who are -- are, I  
17 guess -- I don't know the proper way to say this, but  
18 they're Black Cubans, so they are -- they are, you know,  
19 Black and Latino.

20           Q.     Do you have any members who identify --  
21 this is still within Greater St. Paul parishioners.

22                  Do you have any members who identify as  
23 Hispanic but do not identify as Black?

24           A.     Yes.

25           Q.     And can you describe generally -- is there

1 a general description of who those people are?

2 A. We've got -- we've got -- we've got Puerto  
3 Rico family who attends our church, we have a family from  
4 Colombia who attends our church or who are members of our  
5 church -- our congregation, and I don't -- there's  
6 another lady, and I'm not sure of where she is from, but  
7 she's also Latino. So we've got multiple Latino members.

8 Q. Are there other membership organizations  
9 that are part of GRACE that have Latino members or  
10 Hispanic members?

11 A. Yes.

12 Q. When GRACE advocates, does it advocate on  
13 behalf of all its members or just the members that  
14 identify as Black?

15 A. All members.

16 Q. Do you recall that Ken Russell used to be  
17 the District 2 Commissioner?

18 A. Yes.

19 Q. During the period in which Ken Russell was  
20 the commissioner for District 2, did GRACE ever get is  
21 any indication that Commissioner Russell was interested  
22 politically in GRACE as -- you know, the constituents of  
23 GRACE politically -- as representative of District 2,  
24 that he was concerned about their political views or  
25 their voting patterns?

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1 A. Yes.

2 Q. Why is that?

3 A. Well, because GRACE represented a large  
4 part of its constituency, and to hear the -- to hear  
5 GRACE would be to hear the concerns of a large group.  
6 Additionally, GRACE had the resources to -- we had  
7 resources. We had attorneys and we had other groups that  
8 worked with us, that provided, you know, services that  
9 could help us to make cases. And so, I think he was  
10 interested in what we brought to the table.

11 Q. Do you believe that Grace's members who  
12 live in District 2 have an impact on who is elected from  
13 District 2?

14 A. Yes.

15 Q. Why do you believe they had that impact?

16 A. Because District 2's elections are won by  
17 such a small -- or determined by such a small margin that  
18 all of the voters there, their votes are important. So  
19 because of the small margin of people that vote, the  
20 people that GRACE represents, their votes are extremely  
21 important.

22 Q. If the West Grove were moved into  
23 District 4, do you think that Grace's members in the West  
24 Grove would have an impact on who ends up getting elected  
25 to represent District 4?

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1 A. Not as much as it would in District 2.

2 Q. And why is that?

3 A. Because the demographics are much  
4 different. And so, if there are more voters who don't  
5 share your concerns or your issues, then it -- you know,  
6 it dilutes the impact of your vote.

7 Q. Now, do you remember just a little bit ago  
8 we were talking about a meeting in which WLRN attended  
9 and was recording?

10 A. I remember that.

11 Q. Do you know what meeting that was?

12 A. That was a community meeting where we  
13 discussed the redistricting. I believe at that meeting  
14 we talked about maps, and we heard the concerns of people  
15 from the community and what they wanted to see or did not  
16 want to see.

17 Q. Do you know if that meeting took place  
18 before the mediation that was held in this case?

19 A. I believe that meeting took place after --  
20 well, wait, no. Sorry, I always get the dates mixed up.

21 I remember that being a long day.

22 Q. Which day was a long day?

23 A. The day that we had that meeting at Greater  
24 St. Paul. That was a long day.

25 Q. So was the meeting in the evening?

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1           A.     It was in the evening; it was dark. It was  
2 a long day. And I believe that -- I don't know if that  
3 meeting was before. I think that meeting was before the  
4 mediation, I believe. I don't remember. I'm sorry with  
5 the dates.

6 MS. MCNAMARA: No further questions from  
7 plaintiffs.

## REDIRECT EXAMINATION

9 BY MR. LEVESQUE:

10 Q. I've got just a couple followups. I'm  
11 always reluctant to say I've got just one more question  
12 because that usually doesn't turn out to be the case.

13 Did Commissioner Russell attend any of the  
14 meetings where maps were shared?

15 A. No.

16 Q. Has Commissioner Russell been in any  
17 meetings that you have had with your attorneys?

18 A. No.

19 Q. And you mentioned, when we were discussing  
20 it, that WLRN was recording the committee meeting.

As a practical matter, no one from GRACE or any of the other plaintiffs made a habit of recording any of those community meetings, correct?

24 A. Correct.

Q. So I know you testified that you weren't

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1 talking about things in racial terms, and I certainly  
2 take your word for it, but it's possible that another  
3 plaintiff or somebody else might have been raising those  
4 issues, correct?

5 A. Yes.

6 Q. You just wouldn't have heard it?

7 A. At a meeting?

8 Q. Yes.

9 A. Oh, no. I think racial concerns were  
10 brought up at meetings, but that wasn't taken into  
11 consideration with our -- with our maps -- the maps we  
12 had drawn -- that we drew.

13 Q. Okay. So the communities were expressing  
14 themselves in racial terms, but from what I understand  
15 you to say is, when you were drawing your maps, you  
16 didn't consider that particular feedback as you were  
17 making changes?

18 A. No.

19 Q. And is that true for the evolution of  
20 District 5 where Overtown was included?

21 A. Yes, that is true that we didn't take race  
22 into consideration; we took feedback into consideration.

23 Q. So the inclusion of the historically Black  
24 neighborhood like Overtown, that wasn't included for  
25 racial reasons; that was included just because it was

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1 feedback?

2 A. Just because it was feedback. We -- I  
3 believe my -- from my recollection, we believed that  
4 District 5 had the necessary number of voters to elect,  
5 if they chose a Black representative, with what we  
6 already submitted or we had already drawn or proposed,  
7 being the evolution of that -- of District 5 in our maps  
8 was taking into consideration the feedback that we got  
9 from the community and from the District 5 Commissioner.

10 Q. If you already had enough population to  
11 have the district perform for a Black candidate, wouldn't  
12 adding more population be packing Black residents into  
13 that district to diminish their votes elsewhere?

14 A. I don't know that to be true.

15 Q. Okay. What is your understanding of  
16 "packing"?

17 A. Adding a certain voting group into a  
18 district to strengthen their vote.

19 Q. Okay. Isn't that the effect of what adding  
20 Overtown to that district did?

21 A. I believe so.

22 Q. Okay.

23 A. But I don't think that was our intent when  
24 we made the changes.

25 Q. Okay.

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1           A.     We know that redistricting requires that  
2 there be at least one district that can elect. So  
3 there's almost a require- -- I guess, a requirement to  
4 pack, I guess, if you want to break it down that way.  
5 But our -- the evolution of District 5 in our maps were,  
6 from my recollection, responses to community members and  
7 the commissioner for District 5 saying, hey, this is  
8 actually a part of our neighborhood and we would like  
9 to -- you know, that was why it evolved.

10           Q.     And in the 2023 plan, that was also a  
11 District 5 that the commissioner from District 5 voted  
12 for, correct?

13           A.     Yes.

14           Q.     So she was at least supportive enough and  
15 thought it reflected her community and her community's  
16 interest enough to vote for that plan, correct?

17           A.     I don't know why she show voted for it, but  
18 I know she voted for it.

19           MR. LEVESQUE: Okay. That's all.

20           THE WITNESS: Okay. Thank you.

21           MR. LEVESQUE: Read?

22           MS. MCNAMARA: No, that's good.

23           MR. LEVESQUE: No, I meant read?

24           MS. MCNAMARA: Oh, yes. Yes.

25           (Thereupon, the deposition was concluded at

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1 approximately 5:24 p.m. Signature and formalities  
2 were not waived.)  
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1 EXCEPT FOR ANY CORRECTIONS MADE ON  
2 THE ERRATA SHEET BY ME, I CERTIFY  
3 THIS IS A TRUE AND ACCURATE TRANSCRIPT.

4 REVEREND NATHANIEL ROBINSON, III

5 Sworn to and subscribed before me this

6 day of 2023.

7 Personally known or I.D. \_\_\_\_\_

8  
9  
10 Notary Public in and for the  
11 State of Florida at Large

12 My commission expires:

13  
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1 CERTIFICATE OF OATH OF WITNESS  
2

3 THE STATE OF FLORIDA )  
4 COUNTY OF PALM BEACH ) SS:  
5

6  
7 I, Robyn Maxwell, Registered Professional  
8 Reporter, Registered Professional Reporter, Notary Public  
9 in and for the State of Florida at Large, certify that  
10 the witness, REVEREND NATHANIEL ROBINSON, III, personally  
11 appeared before me on October 11, 2023 and was duly sworn  
12 by me.

13 WITNESS my hand and official seal this  
14 25th day of August, 2017.

15 

16 \_\_\_\_\_  
17 Robyn Maxwell, RPR, FPR, CLR  
18 Realtime Systems Administrator  
19 Notary Public, State of Florida at Large

20 Notary No. HH 232817  
21 My Commission Expires: 4/4/2028  
22  
23  
24  
25

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1 REPORTER'S DEPOSITION CERTIFICATE  
2

3 THE STATE OF Florida )  
4 COUNTY OF PALM BEACH )  
5

6 I, Robyn Maxwell, Florida Professional  
7 Reporter, certify that I was authorized to and did  
8 stenographically report the deposition of REVEREND  
9 NATHANIEL ROBINSON, III, the witness herein on  
10 October 11, 2023; that a review of the transcript was  
11 requested; that the foregoing pages numbered pages 1  
12 through 131; and that the transcript is a true and  
13 complete record of my stenographic notes.

14 I further certify that I am not a  
15 relative, employee, attorney, or counsel of any of the  
16 parties, nor am I a relative or employee of any of the  
17 parties' attorney or counsel connected with the action,  
18 nor am I financially interested in the action.

19  
20 DATED this 25th day of August, 2017.  
21

22   
23

24 Robyn Maxwell, RPR, FPR, CLR  
25 Realtime Systems Administrator

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1 Caroline A. McNamara, Esquire

cmcnamara@aclufl.org

2

3 25th of October, 2023

4 RE: GRACE, Inc. Et al vs. City Of Miami

10/11/2023, REVEREND NATHANIEL ROBINSON, III, FLA 6121410

5

6 The above-referenced transcript is available for  
7 review.

8 The witness should read the testimony to verify its  
9 accuracy. If there are any changes, The witness should  
10 note those with the reason on the attached Errata Sheet.

11 The witness should, please, date and sign the Errata  
12 Sheet and email to the deposing attorney as well as to  
13 Veritext at Transcripts-fl@veritext.com and copies will  
14 be emailed to all ordering parties.

15 It is suggested that the completed errata be returned  
16 30 days from receipt of testimony, as considered  
17 reasonable under Federal rules\*, however, there is no  
18 Florida statute to this regard.

19 If the witness fails to do so, the transcript may be  
20 used as if signed.

21

22 Yours,

23 Veritext Legal Solutions

24 \*Federal Civil Procedure Rule 30(e)/Florida Civil

25 Procedure Rule 1.310(e)

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1 RE: GRACE, Inc. Et al vs. City Of Miami | FLA 6121410

2 DEPO OF: REVEREND NATHANIEL ROBINSON, III

3 TAKEN: 10/11/2023

4 E R R A T A S H E E T

5 PAGE \_\_\_\_\_ LINE \_\_\_\_\_ CHANGE \_\_\_\_\_

6 \_\_\_\_\_

7 REASON \_\_\_\_\_

8 PAGE \_\_\_\_\_ LINE \_\_\_\_\_ CHANGE \_\_\_\_\_

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10 REASON \_\_\_\_\_

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13 REASON \_\_\_\_\_

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16 REASON \_\_\_\_\_

17 PAGE \_\_\_\_\_ LINE \_\_\_\_\_ CHANGE \_\_\_\_\_

18 \_\_\_\_\_

19 REASON \_\_\_\_\_

20 \_\_\_\_\_

21 Under penalties of perjury, I declare that I have  
read the foregoing document and that the facts  
stated in it are true.

22 \_\_\_\_\_

23 \_\_\_\_\_

24 \_\_\_\_\_

25 REVEREND NATHANIEL ROBINSON, III DATE

[&amp; - 3:43]

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FLORIDA RULES OF CIVIL PROCEDURE

Rule 1.310

(e) Witness Review. If the testimony is transcribed, the transcript shall be furnished to the witness for examination and shall be read to or by the witness unless the examination and reading are waived by the witness and by the parties. Any changes in form or substance that the witness wants to make shall be listed in writing by the officer with a statement of the reasons given by the witness for making the changes. The changes shall be attached to the transcript. It shall then be signed by the witness unless the parties waived the signing or the witness is ill, cannot be found, or refuses to sign. If the transcript is not signed by the witness within a reasonable time after it is furnished to the witness, the officer shall sign the transcript and state on the transcript the waiver, illness, absence of the witness, or refusal to sign with any reasons given therefor. The deposition may then be used as fully as though signed unless the court holds that the reasons given for the refusal to sign require rejection of

the deposition wholly or partly, on motion under rule 1.330(d)(4).

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THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE STATE RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

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